



## CHAPTER SIX : Consultation + Coordination



## 6.0 CONSULTATION AND COORDINATION

### 6.1 INTRODUCTION

This document has been prepared with input from and coordination with interested agencies, organizations, and individuals. Public involvement is a vital component of the Resource Management Planning (RMP) process and Environmental Impact Statement (EIS) preparation for vesting the public in the effort and allowing for full environmental disclosure. Guidance for implementing public involvement is codified in 40 CFR 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the National Environmental Policy Act (NEPA) process through preparation of the EIS.

Public involvement for the King Range RMP is being conducted in two phases, as follows:

- Public scoping prior to NEPA analysis to obtain public input on issues, the scope of the analysis, and to develop the proposed alternatives, and
- Public review and comment on the Draft RMP/EIS, which includes analyzing possible environmental impacts and identifying the final preferred alternative for the Proposed Plan and Final EIS.

A summary of the earlier public scoping process is available in Chapter 5 of the Draft RMP/EIS and is not reproduced here. This chapter summarizes and responds to public comments submitted on the Draft RMP/EIS.

### 6.2 DISTRIBUTION AND AVAILABILITY OF THE DRAFT RMP/EIS

#### 6.2.1 Notice of Intent

The public comment period for the King Range RMP/EIS opened with publication of the notice of availability (NOA) in the *Federal Register* on January 16, 2004 (Volume 69, Number 11). This NOA notified the public of the BLM's publication of the Draft RMP and associated Draft Environmental Impact Statement for those lands within the KRNCA planning area boundary (Appendix I). The NOA also solicited public comments and participation.

#### 6.2.2 Advertisements and Announcements

Newspaper advertisements, a press release, and informal flyers were issued or posted to notify the public of the project, to announce the five public scoping meetings, to request public comments, and to provide contact information. Press releases were sent to local and major northern California news media, and meeting announcements were published in several local and regional newspapers including the *Eureka Times Standard*, the *Southern Humboldt Life and Times* (Garberville), and the *Independent* (Garberville). Press releases were not carried by San Francisco Bay Area newspapers, so a display advertisement was published in the *San Francisco Bay Guardian* on February 18, 2004. Flyers announcing the public scoping meetings were posted in numerous locations, including KRNCA campgrounds, and shops and organizations in Shelter Cove, Whitethorn, Petrolia, Honeydew, Redway, Garberville, Eureka, Arcata,

Berkeley, and San Francisco. In addition, BLM staff conducted an on-air interview at KMUD radio station (Garberville) to publicize the scoping meetings and discuss various topics relating to the plan update.

### **6.2.3 Project Website**

An informational website, [www.ca.blm.gov/arcata/kingrange/King\\_Range\\_Plan.html](http://www.ca.blm.gov/arcata/kingrange/King_Range_Plan.html), was updated and made available to the public on November 4, 2002. It provided background information on the King Range, downloadable version of the Draft RMP/EIS, an outline of the planning process, a schedule of upcoming meetings, plus an opportunity for people to e-mail comments directly to the BLM offices. It had received 498 hits between January and March 2004.

### **6.2.4 Planning Update Mailers**

The BLM produced three special Planning Update mailers: one prior to scoping, one to highlight the draft alternatives, and one announcing the publication of the Draft RMP. These were sent via direct mail to the KRNCA mailing list and were also distributed at public meetings. The Planning Updates included background information on the King Range, a description and timeline for the upcoming planning process, dates and locations of the public scoping meetings, and contact information for getting public comments to the BLM.

### **6.2.5 Public Comment Meetings**

Five public comment meetings were held in February and March 2004, with four in local communities close to the King Range and one in the San Francisco Bay Area: Petrolia, CA on February 23; Eureka, CA on February 24; San Francisco, CA on February 26; Garberville, CA on March 3; and Shelter Cove, CA on March 4. All five meetings were held in the evening on weekdays, from 6-8pm. Attendance totaled 77 individuals, with the breakdown per meeting as follows:

- Petrolia: 20 people
- Eureka: 28 people
- San Francisco: 9 people
- Garberville: 7 people
- Shelter Cove: 13 people

The meetings were held to summarize the Draft RMP/EIS for the public, via a PowerPoint presentation given by BLM staff on the plan, the alternatives considered, and the preferred alternative. Participants were then invited to ask questions or offer formal comment on the plan, which was recorded as accurately as possible on flip-charts by EDAW staff. Commentors were asked to sign in when entering the meeting and to indicate whether they wanted to speak (although comments were accepted from everyone, not only those who had indicated their interest on the sign-in sheet). At the beginning of their oral comments, each individual was asked to provide their full name, and after making their comments, were asked to ensure their meaning was captured correctly by the recorder. Public comment forms were also distributed that people could hand them in at the meeting or mail them in later, if they preferred to

write their comments rather than speak publicly. Everyone was told that they could submit written comments in any format (i.e., using the form provided was not required), even if they already made oral comments at the meeting, so as to elaborate on previously-made points or to raise new issues or concerns.

### **6.2.6 Other Outreach and Consultation**

Humboldt County was approached by the BLM regarding “cooperating agency” status at the beginning of the RMP process. Although the County has not become a formal cooperator, efforts have been ongoing with County staff to coordinate the RMP and the Humboldt County General Plan Update. The BLM met with Humboldt County Planning Department staff on 7/2/04 and provided a briefing on the Draft RMP. The following state agencies have been provided with information on the RMP process and consultation is ongoing with: the State Historic Preservation Officer (SHPO), California Department of Fish and Game, California State Parks and California Coastal Commission. The Draft RMP was also submitted to the California Governor’s Clearing House for review by appropriate agencies. Consultation is ongoing with, and Biological Assessments are under preparation and will be submitted to the Fish and Wildlife Service and NOAA Fisheries with the Proposed RMP. The Bear River Band of the Rohnerville Reservation was provided with a copy of the Draft RMP and contacted as the Federal Recognized Tribal Entity for consultation purposes. The BLM has an ongoing relationship with this tribe regarding management of the KRNCA, and they had no specific comments on the RMP.<sup>1</sup>

## **6.3 PUBLIC REVIEW AND COMMENT ON THE DRAFT RMP/EIS**

Public comment forms were distributed to participants at all meetings, and oral comments were recorded. By the end of the public comment period, 862 agency, individual, or organization comments were received. The breakdown of respondents and number of comments is as follows:

- 5 comment letters from public agencies—see Section 6.3.1 below
- 11 comment letters from organizations—see Section 6.3.2 below
- 33 verbal comments by individual at public meetings—see Section 6.3.3 below
- 813 written messages from individuals (emails and postal messages), of which 39 were individualized and 774 were form messages—see Section 6.3.4 below

### **6.3.1 Commenting Public Agencies (5)**

1. Mendocino County Air Quality Management District (Christopher Brown)
2. U.S. Geological Survey (Trish Riley)
3. California Office of Historic Preservation (Knox Mellon)
4. State of California, Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit (Terry Roberts)

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<sup>1</sup> Call from Robert Wick to Edwin Smith, Tribal Council Member and Tribal Environmental Coordinator on 8/30/04 --- Mr. Smith commented that: “We’re fine with it.”

5. United States Environmental Protection Agency, Region IX, San Francisco, CA (Lisa Hanf)

Letters from these agencies are shown in Attachment 6-1 at the end of this chapter. Individual comments are identified by number in the right-hand margin. A summary of each letter is provided below, followed by BLM's response to each identified comment. For this purpose a two-part reference number is used: the first number refers to the number assigned to each letter above and marked in the upper-right corner of the letter in Attachment 6-1; the second number refers to the individual comment number assigned in the right-hand margin of each letter. The summary before each letter is intended to provide a short overview for readers' convenience, and not as a BLM interpretation of the comment's meaning. The BLM responses are based on the comments in the letters themselves.

#### ***6.3.1.1 Mendocino County Air Quality Management District***

##### **Summary of Comments**

The District suggested that the RMP should identify the portion of study area that falls within the Mendocino County Air Quality Management District, and work with District to follow air quality guidelines.

##### **Responses**

- 1-1. The plan is amended to address the comment.

#### ***6.3.1.2 U.S. Geological Survey***

##### **Summary of Comments**

The U.S. Geological Survey has reviewed the King Range National Conservation Area Draft Resource Management Plan and Environmental Impact Statement and has no comments to offer.

#### ***6.3.1.3 California Office of Historic Preservation***

##### **Summary of Comments**

The Office agrees that Alternative D is most desirable for cultural resources, and notes that some specific actions will be subject to provisions of the BLM State Protocol Agreement.

##### **Responses**

- 3-1. Comment noted. Alternative D has been carried forward as the Proposed RMP.

#### ***6.3.1.4 State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit***

##### **Summary of Comments**

No state agencies commented via the Clearinghouse by the deadline of April 16, 2004. BLM has complied with the state environmental review process.

### **6.3.1.5 U.S. Environmental Protection Agency**

#### **Summary of Comments**

The Agency classifies the DEIS as LO, “Lack of Objections.” Commend proposal to designate Mill Creek as an ACEC, and suggest working with the CRWQCB to ensure consistency with their action plans for the Mattole River.

#### **Responses**

5-1. Document rating by EPA of “LO” noted.

### **6.3.2 Commenting Organizations (11)**

6. California Wilderness Coalition (Ryan Henson)
7. International Mountain Bicycling Association (Jim Haagen-Smit)
8. Sierra Club, North Group, Redwood Chapter (Bob Wunner and Emelia Berol)
9. Community Wilderness Alliance (Rich Polley)
10. Mill Creek Watershed Conservancy (Jim Groeling)
11. Environmental Protection Information Center (Scott Greacen)
12. Mattole Salmon Group (Drew Barber)
13. Northcoast Environmental Center (Lynn Ryan)
14. Mattole Restoration Council (Chris Larson)
15. Backcountry Horsemen of California (Carole Polasek)
16. Middle Mattole Conservancy (Richard McGuinness)

Similar to the agency comment section above, letters from these organizations are shown in Attachment 6-1 at the end of this chapter. Individual comments are identified by number in the right-hand margin. A summary of each letter is provided below, followed by BLM’s response to each identified comment. For this purpose a two-part reference number is used: the first number refers to the number assigned to each letter above and marked in the upper-right corner of the letter in Attachment 6-1; the second number refers to the individual comment number assigned in the right-hand margin of each letter. The summary before each letter is intended to provide a short overview for readers’ convenience, and not as a BLM interpretation of the comment’s meaning. The BLM responses are based on the comments in the letters themselves.

### 6.3.2.1 California Wilderness Coalition (CWC)

#### Summary of Comments

The CWC objects that the Preferred Alternative does not propose any areas be managed for wilderness characteristics outside of the existing King Range WSA and suggest designating proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA as backcountry. They express concern that the impact of salvage logging on proposed wilderness areas in the frontcountry is not discussed. In addition, they feel the description of mountain bike policy in the Draft RMP (p. 2-145) is not consistent with the BLM's 1995 *Interim Management Policy* for bicycle use in WSAs.

#### Responses

6-1. **Management of areas outside WSAs for wilderness characteristics.** The Proposed RMP adds unit 2A and the Squaw Creek portion of 1H to the Backcountry Zone, to be managed to protect their wilderness characteristics. The remaining units are proposed for management as part of the Frontcountry Zone to allow for forest and fuels treatments on previously harvested stands. However, these management actions would serve to increase naturalness on the inventory units over the long-term by returning them to a historic forest structure. The Proposed RMP states that actions would not affect future consideration of any units for wilderness characteristic protection.

6-2. **Impacts of salvage logging.** This issue has been clarified in the Proposed RMP in Section 5.4.8. Salvage logging would only be implemented where it would improve natural stand characteristics, and therefore wilderness characteristics, in the long-term.

6-3. **Designate Inventory Units 1EA, 1E, 1F, 1G, 1H and 1HA as Backcountry.** See response 6-1 above. Also, parcels 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section, and 1HA, although naturally appearing, have areas of extremely high fuel loads and are in close proximity to private rural subdivisions. They therefore do not fit within this plan's definition of Backcountry. The Frontcountry Zone allocation also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for "lighter-hand" suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones.

6-4. **Mountain bikes in WSAs.** The text has been updated to reflect proper interpretation of BLM's *Interim Management Policy for Lands Under Wilderness Review* (H-8550-1). The proposed RMP also identifies routes where mountain bikes would be allowed as a temporary use.

6-5. **Support for RMP allocations and actions regarding management zones, ACECs, watershed restoration, grazing, and fire.** Comment noted; these management prescriptions are all carried forward in the Proposed RMP.

### 6.3.2.2 *International Mountain Bicycling Association (IMBA)*

#### Summary of Comments

IMBA encourages provisions for multi-use trails that allow mountain biking in the Backcountry Zone. The group questions the categorization of mountain bicycling as a “special” and “emerging” use and suggests they are long-time trail users and advocates. In addition, they assert that exclusion of mountain bikers from the backcountry is a significant adverse impact. IMBA also expresses concern that the Draft RMP does not embrace mountain biking as called for in the BLM’s *National Mountain Biking Strategic Action Plan*.

#### Responses

7-1. **Opportunities for mountain biking in KRNCA, including Backcountry Zone.** Comment noted. The Proposed Plan seeks to provide opportunities for mountain biking in the Frontcountry Zone where it is compatible with national BLM policies and the Proposed RMP land use allocations.

7-2. **Add mountain biking to list of activities.** Mountain biking was discussed on page 2-145 of the Draft RMP. Mountain biking was not listed as a major activity in the Draft Plan because historically use levels have been very limited relative to many other activities in the KRNCA. Due to the mountain biking community’s interest in working with the BLM to expand opportunities in the KRNCA, the lack of suitable trails in the area, and the level of demand for additional riding areas, this activity has been added as a major focus on management in the Frontcountry Zone.

7-3. **Mountain biking as an appropriate low-impact “non-motorized” use in the Backcountry Zone.** Based on the current low levels of use, resource impacts of mountain bikes to trail treads, watersheds etc. are not considered an issue in the KRNCA and are not addressed as an impact in the Proposed RMP. Compatibility with management for wilderness characteristics is the rationale for limiting mountain bike use in the Backcountry Zone and for transitioning this use into the Frontcountry Zone. The Proposed RMP text has been updated to replace “non-motorized” with “non-mechanized” to more clearly reflect the land use allocation of the Backcountry Zone to be managed for wilderness characteristics. The Plan seeks to develop a mountain bike suitable trail system in the Frontcountry Zone that would mitigate the long-term impact of not allowing mountain bikes in the Backcountry Zone.

7-4. **Mountain bikes in WSAs.** The Draft RMP contained a statement regarding BLM’s *Interim Management Policy for Lands Under Wilderness Review* (IMP) that indicated mountain bikes are allowed on existing trails within WSAs. Under the national IMP, mountain biking is only allowed on routes inventoried as vehicle ways in the initial wilderness inventory. All existing trails in the King Range are contained within or adjoining the WSAs. The Proposed RMP text has been updated to reflect the correct interpretation of the policy. The Proposed RMP calls for managing the Backcountry Zone for wilderness characteristics as a land use allocation during the life of the plan, whether or not Congress formally designates the area as Wilderness. Mechanized uses, including mountain bikes are not considered to be compatible with management for wilderness characteristics. The Proposed RMP allows mountain biking as a temporary use under permit on approximately 23 miles of routes that were inventoried as ways. These routes include the Cooskie Creek, Buck Creek, Spanish Ridge, and Kinsey Ridge Trails. Mountain bike use would be discontinued in the Backcountry upon Congressional wilderness designation or development of a Frontcountry Zone trail network.

7-5. **Relative impacts of different user groups to resources.** Impacts to the trail tread or other resources are considered to be minor among all existing user groups, including hikers, mountain bikers, and equestrian users.

7-6. **Working with BLM to expand trails in Frontcountry Zone.** Comment noted. The Proposed RMP includes specific language to expand non-motorized use trails in the Frontcountry Zone, with design and management accommodating mountain biking as a primary use.

7-7. **Mountain biking as a “special,” “non-traditional,” or “emerging” use.** Comment noted. The references to mountain biking among emerging uses have been changed, and the Proposed RMP has been clarified. The Proposed RMP has identified mountain biking as a temporary use within the Backcountry Zone as it is not considered to be compatible with long-term management goals for this part of the KRNCA.

7-8. **Implementation of BLM’s *National Mountain Bicycling Strategic Action Plan*.** The Proposed RMP is consistent with the *National Mountain Bicycling Strategic Action Plan*. Under the Proposed RMP, the BLM would proactively work with the mountain bike community to implement mountain biking opportunities where they are compatible with the management zone goals and objectives and national policy relating to WSAs. A reference to the strategic plan has been added to the mountain biking discussion in Chapter 3.

7-9. **Impacts to mountain bicyclists from trail closures.** The impact description has been revised to reflect the Proposed RMP. However, the impact is still considered to be minor based on the low levels of use on the existing trail system and the proposal to develop similar opportunities in the Frontcountry Zone prior to any closures of existing trails. Closure of certain trails to mountain bikes through the BLM’s *Interim Management Policy for Lands Under Wilderness Review*, or Congressional wilderness designation, is outside the scope of this plan and therefore is not included in the impact analysis. Trails such as Chemise Mountain, King Crest, Lightning, and Rattlesnake Ridge were not inventoried as vehicle ways, so are closed by the IMP and are not under the discretion of this plan.

7-10. **User conflicts.** No major conflicts have been observed or reported in the KRNCA between mountain bikers and other trail users based on the current low levels of mountain bike use.

7-11. **Relationship with other plans.** The BLM is coordinating with California Department of Parks and Recreation to ensure that the King Range RMP and Sinkyone Wilderness State Park Management Plan have complementary objectives. A discussion of BLM’s *Mountain Bike Strategic Action Plan* has been added to the Proposed RMP.

### ***6.3.2.3 Sierra Club, North Group, Redwood Chapter***

#### **Summary of Comments**

The Sierra Club recommends that the Final RMP/EIS designate the proposed wilderness portions of area 1A, 1B, 1Ea, 1E, 1F, 1G, 1H, and 1Ha as backcountry to maintain their wilderness values, and recommends high opportunities for solitude. Sierra Club proposes several management measures to

reduce impacts in the Big Flat and Spanish Flat areas. Sierra Club expresses support for the Wild and Scenic Rivers designation and water rights protection. The group opposes salvage logging and suggests BLM take a more active role in local community growth concerns.

### Responses

8-1. **More of wilderness story should be told.** The Affected Environment Chapter gives a brief overview of resources affected by planning actions and is not intended to be a comprehensive history and overview of the area's values. Section 4.19 discusses interpretation and education goals for the KRNCA. The BLM agrees that, particularly in the King Range, wilderness values are important to interpret and will be an integral part of the management program.

8-2. **Incorporate archeological sites between Windy Point and mouth of Mattole into Backcountry Zone.** The archaeological resources of the Mattole Beach corridor are given special recognition and management protection through designation as an Area of Critical Environmental Concern. The Backcountry Zone has been extended in the Proposed RMP along the coastal strand from Windy Point northward to just south of the Mattole Campground primarily for recreation management purposes.

8-3. **Add Mill Creek ACEC to King Range wilderness.** The Proposed RMP includes special management protection for the Mill Creek Area of Critical Environmental Concern (ACEC)/Research Natural Area (RNA)'s watershed and old-growth forest values. Some of the lands within this area were logged prior to public acquisition and require silvicultural treatments to assist the area's effective ecological recovery and return to naturalness. The Proposed RMP states that no actions will cause long-term impacts to the area's wilderness characteristics.

8-4. **Designate proposed wilderness parcels as Backcountry Zone.** See response 6-3 above.

8-5. **Manage for high opportunities for solitude.** The Proposed RMP would manage the Backcountry Zone for levels of use that allow for high opportunities for solitude and low levels of encounters between visitors at most locations and times of the year. Levels of use during holiday periods and summer weekends and at popular campsites would allow moderate levels of encounters between visitors and moderate levels of solitude. Visitor surveys conducted in 1997 and 2003 indicate that crowding is not currently a major issue in the King Range backcountry, and the modest growth in use allowed under the Proposed RMP will still allow for quality wilderness experience.

8-6. **More information that areas lacking plant cover and/or erosive features are natural.** Information is currently not available to further determine whether or not the degree of past ridgetop vegetation reduction is natural. These past impacts are discussed in detail in the Rangeland Health Assessments, which were developed based on the best available information. Section 3.12.3.2 of this document contains a summary of the Rangeland Health Assessment information on resource conditions and trends of all allotments affected by this plan. The allotments have been comprehensively assessed to ensure that they are meeting California's *Standards and Guidelines for Rangeland Health* and that trends in resource quality are improving. Under the grasslands habitat objectives and standards (Section 4.13.3.5), ongoing monitoring is required as part of the Proposed RMP. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM

would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends.

8-7. **Relative cost of grazing vs. erosion control and vegetation management projects.** No major erosion control or vegetation management projects related to impacts from current cattle grazing have been undertaken in the KRNCA to date, and so no costs are attributed to this management. Some impacts exist due to historic sheep grazing, but sheep are not currently grazed on any of the allotments.

8-8. **Big Flat management.** BLM has been increasing backcountry patrols of the Big Flat area and plans to continue. Composting toilets are listed as a management action in the Proposed RMP if monitoring shows that they are necessary. The Proposed RMP would not allow for boat landings on the beach except in emergencies.

8-9. **Big Flat air strips.** As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings, including the Big Flat airstrips, are based on legal rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at the planning level.

8-10. **Spanish Flat grazing allotment.** The Proposed RMP would change the allotment boundary to exclude the marine terraces along the coastal strip and eliminate archeological impacts. The plan would allow for continued grazing while protecting water and vegetation quality on the remaining portions of the allotment. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends.

8-11. **Water rights and rights-of-way.** The Proposed RMP would require BLM to secure water rights with all new acquisitions. Any water rights applications (allowable only in Frontcountry and Residential Zones) would require an Environmental Assessment under NEPA and would only allow for diversions during the wet season, not the critical dry summer months.

8-12. **Management of vegetation.** The plan does not impose silvicultural treatments in old growth stands or within the Backcountry Zone. However, the 1970 King Range Act called for return of cut-over forest lands to ecologically sound conditions, and based on the fire history of the tanoak-Douglas-fir vegetation type, cut-over, previously entered and burned stands located in the Frontcountry Zone will not return to historic characteristics without careful silvicultural modifications. Any silvicultural treatments would have the primary purpose of restoring natural stand characteristics (see Section 4.14.4).

8-13. **No salvage logging.** The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees and snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the

Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

Any road re-opening would be temporary in nature and followed by restoration within 12-18 months, and would only occur in very limited circumstances where environmental analysis shows direct benefit to improving late-successional forest characteristics and no major watershed impacts; see Section 4.14.5 for details. In some cases these actions may serve the dual purpose of removal and restoration of old logging roads.

8-14. **BLM should take an active role in responding to Shelter Cove development.** The 1970 King Range Act intended that the primary use of the Shelter Cove subdivision be for private development and residential use (*House Report on HR 12870*, 1970). The BLM will continue to take an active role in working with Humboldt County, the California Coastal Commission, and the Shelter Cove Resort Improvement District to ensure that development in Shelter Cove is compatible with KRNCA management objectives.

8-15. **Socioeconomic impacts of area management.** Comment noted; see response 8-7 above. Congress provided management direction for the area to the BLM under the King Range Act (Public Law 91-476), which called for managing the area for a number of primary and compatible secondary uses, including recreation, forest management, and grazing.

8-16. **Links to regional landscapes.** Comment noted. The King Range Proposed RMP and the Arcata Field Office RMPs allow the BLM to work with local community governments and organizations to acquire lands and work cooperatively to provide conservation of regional resource values.

8-17. **King Range marine sanctuary.** The Pacific Ocean is outside the BLM's jurisdiction; however, the Proposed RMP recognizes the importance and interdependence of marine resources (e.g., tidepools, marine mammals, anadromous fisheries, etc.) with lands within the KRNCA planning area. The BLM would continue to work with agencies such as California Department of Fish and Game, NOAA Fisheries, the California Coastal Commission, managers of the BLM's California Coastal National Monument, and others to protect marine resources adjacent to the King Range.

### ***6.3.2.4 Community Wilderness Alliance***

#### **Summary of Comments**

The Alliance contends that none of the alternatives adequately protect public water in the King Range and supports Wild and Scenic River status for all waterways in the King Range. The Alliance comments that the grazing allotment at Spanish Flat should be permanently retired. The Alliance recommends the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA be designated as backcountry and objects to bicycles on all King Range trails, boats dropping people on the beach, and the overuse of the Big Flat airstrip.

## Responses

- 9-1. **Support inclusion of King Range lands in Federal Wilderness Preservation System.** Only Congress has the authority to designate lands as federally-protected wilderness; therefore this is outside the scope of the Proposed RMP.
- 9-2. **Support for Alternative B for recreation, due to high opportunities for solitude.** Comment noted; see response 8-5 above.
- 9-3. **Protection of public water in the KRNCA.** See response 8-11 above with regard to water rights and rights-of-way. The Proposed RMP contains direction to assert water rights and protect resource values of area streams regardless of their suitability for Wild and Scenic Rivers designation. The determination of suitability for Wild and Scenic River designation is based on specific criteria as shown in Appendix D.
- 9-4. **Grazing allotment at Spanish Flat.** See response 8-10 above.
- 9-5. **Designate proposed wilderness parcels as Backcountry Zone.** See response 6-3 above.
- 9-6. **No bikes on King Range trails.** See response 7-4 above.
- 9-7. **No boat landings on the beach.** The plan would not allow for boat landings on the beach except in emergencies.
- 9-8. **Airstrip and buildings at Big Flat.** See response 8-9 above regarding airstrips; all buildings at Big Flat are located on private lands. The 1970 King Range Act allows and establishes criteria for continued use and occupancy of private property within the KRNCA boundary.

### *6.3.2.5 Mill Creek Watershed Conservancy*

## Summary of Comments

The Conservancy disagrees with the Draft RMP designations of zones for the Mill Creek and Squaw Creek lands and recommends the majority of the lands be designated as backcountry. The Conservancy objects to the preferred alternative in terms of Recreation, stating that it is too invasive and instead proposes a blend of all of the Alternatives and offers other suggestions. Other recommendations include not allowing herbicide use, leaving Telegraph Road open for emergency fire access, not allowing commercial permits to non-tribal uses of special forest products, and changing Mill Creek to Backcountry Zone status. The Conservancy did not make a recommendation for Grazing Management due to various sentiments.

## Responses

- 10-1. **Include Mill Creek watershed and Squaw Creek parcels in the Backcountry Zone.** The Proposed RMP has been revised to include the Squaw Creek section of unit 1H in the Backcountry Zone. However, the parcels in the Mill Creek watershed will require silvicultural treatments to assist with ecological recovery and restoration goals; see response 8-3 above. This parcel is also separated from the main body of the Backcountry Zone by several road segments in the upper Mill Creek drainage, and so is

not a logical addition to the zone. As stated in Section 4.3.2 of the Proposed RMP, no additional major public use facilities are proposed for the northern part of the Frontcountry Zone in the Proposed RMP. Also, ACEC/RNA status affords a similar level of protection to the Backcountry Zone, but is geared to the specific values of the ACEC. The ACEC status also provides for area-specific rules and public use requirements that are beyond those proposed for the Backcountry Zone.

10-2. **Designate Mill Creek as an RNA as well as an ACEC.** The Proposed RMP has been revised to include the RNA designation.

10-3. **Support protection of all units for wilderness characteristics, with an allowance for interim restoration measures.** The Proposed RMP determined that Mill Creek and other northern units, although they have wilderness characteristics, will require multiple silvicultural treatments over the life of the plan to restore previously harvested stands (which cover a majority of the acreage) to more natural forest conditions. The proposed treatments would not only reduce fire danger and improve habitat, but would serve to increase naturalness and other wilderness characteristics in the long-term. Based on the present condition of forest stands, a short-term treatment plan would be infeasible and ineffective. No permanent roads or other developments are proposed in the RMP that would preclude Congress from considering these units for wilderness designation.

10-4. **Wild and Scenic Rivers.** Comment noted; Mill Creek remains in the plan as suitable for Wild and Scenic River designation.

10-5. **Salvage logging should never be permitted.** See response 8-13 above.

10-6. **Broadcast burning unsafe.** Broadcast burning would not be used in situations where there is risk of escape onto private lands. In these situations, mechanical fuel reduction would be used.

10-7. **Control camping at Mattole beach area.** The Proposed RMP contains additional limits on camping surrounding the Mattole beach campground to address concerns regarding large gatherings in the area. The proposal for overflow camping on the Mattole River bar that appeared in the Draft RMP has been removed.

10-8. **No fee system for individual backcountry use.** Comment noted. The BLM is committed to maintaining the area with the level of fees consistent with policy and budget requirements.

10-9. **Publicize and enforce a cap on visitor numbers.** The Proposed RMP carries forward a proposed system to develop a carrying capacity program for King Range visitation. Limits are also in place for use of developed campgrounds, including the Mattole Campground.

10-10. **No herbicide use.** The Proposed RMP only allows for herbicide use in limited situations where manual removal of invasive plant species is not feasible, and the spread of these plants would cause extensive ecological damage. Any proposal to use herbicides would require additional environmental analysis prior to implementation.

10-11. **Remove rusting vegetation pyramids.** Comment noted; removal of these structures, old fencing, and other materials is an on-going effort with BLM personnel and volunteers.

10-12. **Transportation and access.** The Proposed RMP keeps Telegraph Ridge and Windy Point Roads open to seasonal use to allow for recreation access to popular trailheads and use areas. Vehicles are required to stay on existing roads to protect coastal prairies and watershed values. Vehicle use in the Mattole Estuary area would be limited to routes that do not impact the estuary values. Signing and driftwood barriers would be placed along allowable travel routes to ensure vehicles do not access the estuary. This will allow for continued community and public use of the area while eliminating resource impacts.

10-13. **Do not acquire land in Residential Zone.** The BLM has very limited landholdings in the Residential Zone, which encompass only the Shelter Cove subdivision. These lands make up the majority of coastal greenspace within the subdivision. In some cases, additional parcels could be needed to provide additional public access, parking etc., which are supported by the local community. The Proposed RMP would allow acquisition in this Zone only after working with the Humboldt County government and local community organizations.

10-14. **No commercial special forest product permits.** Existing special forest product permits are issued to small family collectors for modest levels of harvest, and mostly to people belonging to low-income and/or minority populations. A theme identified during the public scoping process for the Draft RMP was to allow for economic opportunities for local communities. Allowance for continued harvesting of these products provides both local economic opportunities and addresses environmental justice concerns for the area. The Proposed RMP would include monitoring of harvest levels to ensure resource values are protected. No commercial collecting would be permitted within the Mill Creek or Mattole ACECs. The Proposed RMP also carries forward a Native American beargrass area where commercial beargrass harvesting would not be permitted.

10-15. **Visual Resource Management classifications.** The Proposed RMP would classify the Mill Creek area in VRM Class II. This class requires the BLM to retain the existing character of the landscape. It allows for management activities, such as the proposed silvicultural treatments in the Mill Creek watershed, which would not be allowed under Class I objectives. These treatments would still have minimal and temporary visual impacts on the natural landscape.

10-16. **Grazing management.** Comment noted.

#### ***6.3.2.6 Environmental Protection Information Center (EPIC)***

##### **Summary of Comments**

EPIC expresses support for the wilderness boundaries proposed by the California Wild Heritage Campaign and recommends more of the northern sections of the King Range be designated as backcountry, as well as the inclusion of the subunits 1A through 1J in the King Range WSA. EPIC is opposed to all logging in the King Range, and expresses support for the maximum feasible protection of all the 28 stream segments in the King Range. The group opposes opening any areas to bicycles in the WSAs, and generally supports Alternative B for Recreation, suggesting that all recreation in the King Range be low-impact. EPIC recommends the FEIS to document and analyze the ongoing effects of

existing roads and potential impacts of the development of roads as well as the effects of fire suppression and fire-fighting.

## **Responses**

11-1. **Wilderness designation and WSA management.** The settlement of *Utah v. Norton Regarding Wilderness Study* clarified that the BLM's authority to expand Wilderness Study Areas or designate additional areas through the RMP process expired in 1993. However, the BLM can make land use allocations through the RMP to manage areas to protect their wilderness characteristics. Within the King Range RMP, the Backcountry Zone represents this allocation. Parcels 1B, 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section (see response 6-1 above), and 1HA all have previously harvested forest stands that require management such as long-term silvicultural treatments to encourage old growth values or fuels management in areas adjoining private rural subdivisions. These actions would not be allowed within the Backcountry Zone, and so the above parcels are included in the Frontcountry Zone. A primary goal of all silvicultural treatments is to restore stands to a historic ecological state. This would serve to enhance wilderness characteristics of these lands. The Proposed RMP also states that no actions will cause irreversible impacts to wilderness characteristics that would affect future consideration for Congressional wilderness designation. The BLM is aware of the pending wilderness legislation S-738, "Northern California Coastal Wild Heritage Wilderness Act." Nothing in the Proposed RMP would preclude management of the lands proposed in S-738 as wilderness, should this bill be passed into law.

In addition, parcels 1A, 1C, and 2C were not included in Alternative B in the Draft RMP because they did not meet the minimum criteria for wilderness characteristics; hence Alternative B proposed to protect the maximum lands with wilderness characteristics and met the intent of NEPA to provide a full range of reasonable alternatives.

11-2. **No salvage logging.** See response 8-13 above.

11-3. **Maximize Wild and Scenic River protection.** Appendix D of the Proposed RMP outlines the criteria used by all agencies, including the BLM, to study streams for Wild and Scenic River suitability. One of these criteria is to consider stream segments in a regional context. Although many of the streams in the King Range exhibit significant values that meet eligibility criteria, the study team has determined that the values are not at a level that would make these segments worthy additions to the NWSRS when viewed in the context of the California Coastal Range Physiographic Province. The Proposed RMP would protect resource values of area streams regardless of their suitability for Wild and Scenic River designation.

11-4. **No mountain bicycles in areas suitable for wilderness.** The Proposed RMP would phase out mountain biking use in the Backcountry Zone. The plan would allow mountain biking as a temporary use under permit within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as "ways" in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, and mechanized uses are not considered compatible with management of Backcountry Zone for wilderness characteristics. The plan proposes development of a Frontcountry Zone trail network, focused in the Paradise Ridge area. Upon completion of this network, or designation of King Range wilderness, mountain biking would not be allowed in the Backcountry.

11-5. **Airstrip at Big Flat.** See response 8-9 above.

11-6. **Frontcountry Zone management.** The 1970 King Range Act calls for a plan which zones the area for a variety of uses. The proposed zones in this plan reflect a strong emphasis on conservation and restoration of the area's resource values while meeting the intent of the Act to provide a mix of primary and secondary uses (Public Law 91-476). The Proposed RMP does not call for any major new developments, such as permanent roads or facilities (except trails) in the Frontcountry Zone. This zone is not intended to provide only a diminished level of protection; rather, it calls for a more intensively managed restoration effort on those lands adversely impacted by timber harvesting prior to BLM acquisition. The zone also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the Fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for "lighter-hand" suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones.

11-7. **Expansion of the King Range in future land acquisition.** The Proposed RMP would allow the goals identified in this comment to be met. BLM land acquisitions are identified based on local and national management priorities, and the availability of matching non-federal government and private funding opportunities. Therefore, this plan would not result in an overshadowing of "acquisition priority 1 and 2 private lands" identified in the Arcata Field Office RMP.

11-8. **Native plant species restoration.** Comment noted; the BLM will continue to work to protect and expand the range of native plant species.

11-9. **Research and actions to protect wildlife and aquatic species.** The Proposed RMP does not identify specific research and restoration projects, as these will be identified in later project-level implementation plans and NEPA documents. However, the BLM actively works with Humboldt State University and other researchers, as well as community restoration groups, to improve understanding and ecological conditions of species within the region.

11-10. **Existing roads in the King Range should be fully removed and restored.** All roads not included in the Travel Management section (Section 4.18) of the Proposed RMP, or used for administrative or private land access, will continue to be assessed for potential removal. Roads will be removed when it can be demonstrated that the result will be a net reduction in sediment load to streams. Specific roads would be identified in the context of project-level activity plans.

11-11. **Reintroduction of native wildlife.** While only CDFG and FWS have direct authority over wildlife population management (i.e., relocation, removal, or introduction), the BLM remains open to recommendations or options for future actions that are consistent with the goals of the Proposed RMP. The costs and benefits of any species reintroduction proposals are outside the scope of this planning effort and would need to be analyzed separately at that time.

11-12. **Impacts of cross-country vehicle use to Roosevelt elk.** Public lands in the vicinity of the Chemise Mountain and Shelter Cove Road intersection are currently closed to vehicle use, and would remain so under the Proposed RMP. Present cross-country vehicle use in this area is illegal and enforcement and education efforts are on-going.

11-13. **Grazing allotments.** The King Range Act requires the BLM to consider all legitimate uses of resources on public lands, including grazing, in planning and management of the area (PL 91-476). The Proposed RMP would change the Spanish Flat allotment boundary to exclude grazing from the coastal terraces and therefore would eliminate any impacts to cultural resources. Similarly, the coastal dune habitat surrounding Mattole Campground is closed and fenced so that cattle do not graze on the dunes. The plan would allow for continued grazing while protecting water and vegetation quality on the remaining grazing allotments. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends.

11-14. **Manage for recreation experiences/qualities unique to the area with focus on muscle-powered activities, and allow for low-medium use levels.** See comment 8-5. The BLM recognizes the unique values of the KRNCA's undeveloped coastal slope, and the Proposed RMP limits recreation use to non-mechanized activities in the Backcountry Zone. Other parts of the KRNCA are managed for additional uses to meet the intent of the King Range Act to provide for a balanced range of compatible uses.

11-15. **Where recreation and wildlife values conflict, curtail recreation use.** The Proposed RMP includes a number of objectives and actions to ensure that recreation use does not impact wildlife values. For example, the RMP calls for continued visitor education which includes topics such as low impact use, and wildlife viewing ethics. Any proposed recreation developments (trails, etc.) would undergo a site specific environmental analysis to ensure impacts to wildlife and other resources are minimized. The BLM has consulted with the Fish and Wildlife Service and NOAA Fisheries on impacts to Threatened and Endangered Species to ensure that management actions and uses proposed in the RMP do not impact the conservation of these species. Also, the Proposed RMP calls for development of carrying capacities to limit growth of recreation use.

11-16. **Off-highway vehicle management.** Section 4.18 contains specific mileage and map of road segments open to vehicle use. Section 5.11.12 assesses the impacts from this use. Vehicle use off of the open transportation system is an enforcement issue. Impacts from use off of designated routes are assessed on an ongoing basis by field personnel and enforcement efforts adjusted accordingly.

11-17. **Redwoods to Sea corridor.** The Draft RMP makes no reference to the Redwoods to Sea Corridor as a recreational corridor. This area is outside the KRNCA planning area boundary and the Proposed RMP provides no direction for its management. A separate activity level plan will be developed for lands in this area and will include public involvement.

11-18. **Use of private land at Big Flat.** See response 8-9 above; in addition, private land owners within the King Range are subject to the same use limitations on public lands adjacent to their inholdings as any member of the general public using the area.

11-19. **Additional campground development.** The Proposed RMP would include some minor changes to existing facilities but no major expansions or new campgrounds.

11-20. **Recreation user fees.** See response 10-8 above. Also, the initiation of fees would not result in changing allowable uses in any of the management zones.

11-21. **Road closure and removal.** Section 4.10 (Fisheries and Aquatic Ecosystems) of the Proposed RMP identifies the need to remove existing closed roads and improve drainage and maintenance on existing open roads. Impacts from road decommissioning and management of existing open roads are discussed in Sections 5.10 (Fisheries and Aquatic Ecosystems) and 5.11 (Travel Management). No new permanent roads would be constructed under the Proposed RMP. Also see response 11-10 above.

11-22. **Fire management.** Comment noted; no pesticides or herbicides are proposed for use in the fuels management program. Fuels management is only proposed in cut-over and burned areas which contain thick stands of small-diameter trees. The BLM's policy is to not allow use of heavy equipment for fire-fighting within WSAs unless there are immediate threats to life and/or private property.

11-23. **Invasive species.** See response 10-10 above.

11-24. **Protection of cultural sites.** All cultural resources are protected by the National Historic Preservation Act of 1966. Management and protection of cultural resource is an important priority of this planning effort. Also see response 11-13 above.

11-25. **Coordination with the Resort Improvement District, California Coastal Commission, and Humboldt County.** Commented noted. Coordination is on-going with these entities to ensure that King Range resource values are protected.

11-26. **Water quality and quantity and Wild and Scenic Rivers.** Section 4.7 (Lands and Realty) addresses water quality and quantity issues. Also see response 11-3 above.

11-27. **Marine and coastal resources.** See response 8-17 above; BLM will comment on respective plans and their impacts on the King Range as appropriate.

### ***6.3.2.7 Mattole Salmon Group***

#### **Summary of Comments**

The Group states that the Draft RMP generally reflects their preferred management of the Mattole Estuary; however, they are concerned with the sensitive ecology of the estuary and the fact that Mattole Beach is the north access for departure to the Lost Coast Trail. The Group suggests that this recreational use has the potential to negatively impact biological resources. The Group expresses concern with the following issues; the Draft RMP does not seem to directly consider campground impacts on the Mattole River, restoration is not defined completely, the goals stated to work with local restoration groups are not specific enough and the Draft RMP does not seem to reflect potential threats of global climate change. The Group comments on specific management plan alternatives that they both agree and disagree with.

#### **Responses**

12-1. **Impacts of campground expansion on Mattole River, bathing in estuary.** See 10-7 above; the Mattole Campground has been upgraded and a potable water system added. All interpretive/orientation information for visitors to the KRNCA describes proper sanitation practices including carrying water and bathing away from streams.

12-2. **Definition of restoration should not be limited to road removal.** Section 2.7.2.4 of the Draft RMP defined watershed restoration as involving proper road maintenance and/or removal specifically in the context of water quality concerns; it did not intend to imply that there are not other types of actions for ecological restoration that are important. The text has been revised to clarify the issue.

12-3. **Specific goals for collaboration with local restoration groups; can MSG and MRC take leadership roles?** The Proposed RMP is an overall guide for KRNCA management for the next twenty years, and does not contain detailed strategic direction on how the plan will be implemented. Details of partnerships with specific groups and respective roles of the BLM and cooperators will be determined in a subsequent implementation strategy, and on an individual basis as outlined in agreements with respective groups/agencies.

12-4. **Plan should address potential threats from global climate change and build resiliency into King Range ecological systems.** The potential threats from global climate change are not fully understood to the level that the RMP can directly address reasonably foreseeable impacts specific to King Range ecosystems. However, many of the decisions in the RMP will serve to improve the resiliency of resources, such as the reduction of fuel loads in previously harvested stands and continued watershed restoration efforts and storm-proofing of roads. In addition, the Proposed RMP calls for monitoring of resource conditions of the KRNCA to determine effectiveness of management actions and ongoing trends. This will allow for a level of adaptability in the plan to address unforeseen impacts from changing climate conditions.

12-5. **Herbicide use in Mattole watershed when estuary is in lagoon state.** See response 10-10 above; herbicides would only be used in specific instances on non-native invasive weeds, and not for native plant removal.

12-6. **Impacts of salvage logging and road construction on salmonid habitat.** See response 8-13 above.

### **6.3.2.8 Northcoast Environmental Center**

#### **Summary of Comments**

The Center supports Alternative B with some suggested changes involving protecting public water. The Center objects to salvage logging in the King Range. The Center requests that the Final RMP/EIS designate the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA as backcountry as well as Alternative B for backcountry zones. The Center takes issue with the Redwoods to the Sea Recreational Corridor reference in that they prefer it referred to as a biological connectivity linkage. The Center suggests the Final RMP/EIS include a list of routes in the NCA where bicycles are allowed and recommend no designated single-track, single use bicycle trails in the KRNCA. The Center recommends the Spanish Flat grazing allotment be permanently retired. The Center requests that the area 1A through 1J be managed to protect their character for future generations. The Center expresses concern that marine sanctuary is not addressed in the Draft RMP.

## Responses

- 13-1. **Protection of public water in the KRNCA.** See response 9-3 above.
- 13-2. **No salvage logging.** See response 8-13 above.
- 13-3. **Manage for high opportunities for solitude.** See response 8-5 above.
- 13-4. **Redwoods to Sea corridor.** See response 11-17 above.
- 13-5. **Mountain bicycle use in KRNCA.** See responses 6-4 and 11-4 above.
- 13-6. **Spanish Flat grazing allotment.** See response 8-10 above.
- 13-7. **Protect inventory units with wilderness characteristics.** See responses 6-3, 10-3, and 11-1 above.
- 13-8. **Motorized boat landings.** The Proposed RMP does not allow for motorized boat landings on the beach except in emergencies.

### ***6.3.2.9 Mattole Restoration Council***

## Summary of Comments

The MRC expresses concern about the zoning changes and suggests the Squaw Creek drainage be zoned as backcountry, advocates more protection for Cultural and Historic Resources, supports Alternative B for the alternatives for Lands and Realty, and supports acquisition of property in the Shelter Cove area only if it is inappropriate for a residence. MRC supports Alternative C for the ACEC and requests Mill Creek also be given the RNA designation. The Council supports the Preferred Alternative C for Aquatic Ecosystems and for Fisheries and Wildlife Management. The Council recommends Alternative C for vegetative issues (with the exceptions of herbicide use and suggests ridding prairies of rusting vegetation pyramids). The Council supports the Preferred Alternative D for Forest Management; however, suggests more specific guidelines for salvage logging. The Council supports Preferred Alternative C for Grazing Management except for making unavailable the expired grazing allotments and also supports Preferred Alternative C for Fire Management. The Council endorses Alternative B for Transportation and Access (with the exception of the necessity to leave Telegraph Road open for emergency fire access). The Council supports Alternative C for Recreation with several exceptions and agrees with including a visitor registration system at Mattole Beach.

## Responses

- 14-1. **Re-zone Squaw Creek parcel as Backcountry.** The Squaw Creek portion of unit 1H has been added to the Backcountry Zone in the Proposed RMP.
- 14-2. **Support Preferred Alternative for Cultural Resources.** This alternative has been carried forward in the Proposed RMP.

- 14-3. **Land acquisition for properties adjacent to or outside the KRNCA boundary and in Shelter Cove.** Comment Noted. The proposed RMP calls for continued coordination with county government and community & conservation groups in acquisition of properties outside the KRNCA boundary. See also response 10-13.
- 14-4. **Designate Mill Creek as an RNA as well as an ACEC.** See response 10-2 above.
- 14-5. **Oppose use of herbicides in KRNCA.** See response 10-10 above.
- 14-6. **Remove rusting vegetation pyramids.** See response 10-11 above.
- 14-7. **Need for more specific guidelines regarding salvage logging and road re-opening.** See response 8-13 above. The text of the Proposed RMP has been updated to clarify the guidelines.
- 14-8. **Retirement of expired grazing allotments.** Comment noted.
- 14-9. **Transportation and access.** See response 10-12 above.
- 14-10. **No fee system for individual backcountry use.** See response 10-8 above.
- 14-11. **No mountain bicycles in Backcountry/wilderness.** See response 7-4 above.
- 14-12. **No overflow campsites at Mattole beach.** See response 10-7 above.
- 14-13. **Visitor caps needed on backcountry and Mattole Campground use.** Comment noted. The Proposed RMP includes objectives for developing capacities for the Backcountry and Frontcountry Zone trails and facilities.

#### *6.3.2.10 Backcountry Horsemen of California, Redwood Unit*

##### Summary of Comments

The commenter agrees with most of the BLM proposed alternatives; alternatives which Redwood Unit does not agree with are as follows:

- BLM should not acquire more property
- Opposed to changes to the river/stream designations already in place
- Landowners with legal access should be provided with written documentation stating that they have the right to use, maintain and repair their existing road(s) and should be allowed to realign their access road(s) if a large slide or slip-out occurs in order to return it to a usable state.
- Permits should not be required, a self-registration system is acceptable to document use.
- Counting animals in the 15 “heartbeats” context should be limited to people. If animals are to be counted the number should be raised to 25 “heartbeats.” The maximum number of visitors should be allowed to leave any trail head per day.
- Oppose user fees.

## Responses

15-1. **Recommendations regarding property acquisition, Wild and Scenic River designations, and visitor permit system.** Comments noted.

15-2. **Private landowner access.** As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings are based on legal rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at a planning level. Therefore these actions are beyond the scope of this RMP.

15-3. **Counting animals as “heartbeats” on trails.** The Proposed RMP text has been revised to accommodate this concern, raising the total number of “heartbeats” allowed per group on Backcountry Zone trails to 25; the maximum number of people per group remains at 15. There is no limit on the number of visitors allowed to leave a given trailhead each day unless they are part of an organized and/or commercial group. All of these provisions would be interim measures to be updated through development of a final carrying capacity plan for the KRCNA.

15-4. **Opposition to user fees.** See response 10-8 above.

15-5. **Adoption of stipulations for wilderness designation.** Comment noted; only Congress has authority over wilderness designations. The BLM will also consider these concerns long-term carrying capacity and use allocations are developed for the King Range Backcountry Zone.

### *6.3.2.11 Middle Mattole Conservancy*

## Summary of Comments

The Conservancy supports the Preferred Alternatives for KRNCA and offers suggestions for long-term forest management. The Conservancy recommends BLM continue to make protective purchases of industrial timberlands and other properties in the Mattole Valley and discourages roads in the area. The Conservancy notes that there is no mention of corvids in the Draft RMP and encourages the reintroduction of the species. The Conservancy expresses concern with both the restrictive classifications placed on impacted rivers and streams and the threat of global warming.

## Responses

16-1. **Protect wilderness from unnecessary noise; use VRM designations to prohibit offshore drilling.** Comment noted. Management of the WSAs and Backcountry Zone for wilderness characteristics, by definition, means limiting human intrusions including noise. The BLM's Visual Resource Management program only applies to public lands under the agency's jurisdiction. The BLM would comment on any offshore drilling operations with the potential to impact public land resources at the time any developments are proposed.

16-2. **Land acquisition in the Mattole Valley.** Comment noted; see response 14-3 above.

16-3. **Watershed impacts from road construction and maintenance; plan did not address restoration of wet areas like Headwaters Plan.** Comment noted. All existing roads are being

outsloped where possible to minimize impacts to natural drainage patterns. Also road removal will include restoration of natural drainage patterns. The King Range RMP encompasses a larger area and is at a more general level of detail than the Headwaters plan, and so includes less details regarding restoration.

16-4. **Redwoods to Sea corridor.** See response 11-17 above.

16-5. **Plan lacks discussion of corvids.** Corvids are not considered to be a threat to conservation of the northern spotted owl and other species of special concern known to occupy the KRNCA. Extensive surveys for marbled murrelets in the King Range have failed to detect occupancy. Should future murrelet (a species subject to corvid predation) surveys indicate occupancy, additional protective measures would be implemented. The Proposed RMP calls for continuation of the environmental education program, which includes informing visitors on proper food storage/disposal that will minimize corvid attraction on trails and in recreation sites.

16-6. **Species reintroductions.** See response 11-11 above.

16-7. **Wild and Scenic River designation could restrict restoration opportunities.** The BLM is required to study streams for eligibility and suitability for designation under the Wild and Scenic Rivers Act during the RMP process. Restoration actions are permitted on streams found suitable for designation under the Act, as long as they do not impact the free-flowing or outstandingly remarkable values of the segments.

16-8. **Watershed restoration techniques and materials.** Comment noted. The Proposed RMP provides general direction for watershed restoration, and does not detail site specific implementation actions. These techniques will be considered during implementation planning.

16-9. **Glomalin carbon storage.** Comment noted. The reduction of risk of catastrophic fire is a major goal of forest restoration in the Frontcountry Zone. The Proposed RMP and BLM policy allow for and encourage research regarding natural processes and resource conditions on public lands.

16-10. **Watershed impacts of salvage.** Comment noted. See comment 8-13.

16-11. **Research.** See comment 16.9 above

16-12. **Information and interpretation.** Comment noted. The BLM will continue working with the community to improve environmental education and interpretive programs, including web-based information.

### 6.3.3 Persons Commenting at Public Meetings (33)

Petrolia – February 23, 2004:

Otter Anderson

Mary Etter

Ali Freedland

Bobby Goforth

Tracking Number

PM01

PM02

PM03

PM04

Robin Lozito	PM05
John McAbery	PM06
Peggy Morrison-Fox	PM07
Peter Nash	PM08
Rex Rathbun	PM09
Maureen Roche	PM10
Melvin Rodriguez	PM11

Eureka Meeting – February 24, 2004:

Zach Coffman	PM12
Ryan Coltrin	PM13
Timothy Crlenjak	PM14
Greg Gaser	PM15
Tracy Katelman	PM16
Patrick McDaniel	PM17
Carole Polasek/Backcountry Horsemen of California	PM18
Darrel Polasek	PM19
Wendell Schautz	PM20

San Francisco Meeting – February 26, 2004:

[no comments recorded]

Garberville Meeting – March 3, 2004:

Fred Green	PM21
Ryan Henson/CA Wilderness Coalition	PM22
Robert Sutherland	PM23

Shelter Cove Meeting – March 4, 2004:

Cheryl Antony/Shelter Cove Fire	PM24
Jeane Elder	PM25
Leah Fanucchi-Bettis	PM26
Eric Goldsmith/Sanctuary Forest	PM27
John Jennings	PM28
Myra Johnson	PM29
Janet Lopes	PM30
Joe Lopes	PM31
Mel Lynn	PM32
Steve Mobley	PM33
Melvin Rodriguez [attended two meetings]	PM11

Comments from these individuals are summarized by BLM below and are organized by topic. BLM responses are given. Persons commenting are listed above in the order that they spoke. A tracking number is used so that individual comment summaries can be correlated with the commenter. At the beginning of their oral comments, each individual was asked to provide their full name, and after making their comments, were asked to ensure their meaning was captured correctly by the recorder. Copies of the meeting notes are available from the BLM Arcata Field Office upon request.

### 6.3.3.1 *Management Zones*

#### Comment Summary

- Concern regarding standards for salvage of old growth in Frontcountry, favor change following to Backcountry status: 1EA, 1E, 1F, 1G, 1H, and 1HA. (PM22)

#### Responses

The Proposed RMP adds unit 2A and the Squaw Creek portion of 1H to the Backcountry Zone, to be managed to protect their wilderness characteristics. Parcels 1EA, 1E, 1F, 1G, the portion of 1H other than the Squaw Creek section, and 1HA, although naturally appearing, have areas of extremely high fuel loads and are in close proximity to private rural subdivisions. They therefore do not fit within this plan's definition of Backcountry. They are proposed for management as part of the Frontcountry Zone to allow for forest and fuels treatments on previously harvested stands. However, these management actions would serve to increase naturalness on the inventory units over the long-term by returning them to a historic forest structure. The Proposed RMP states that actions would not affect future consideration of any units for wilderness characteristic protection.

### 6.3.3.2 *Lands and Realty – Water*

#### Comment Summary

- Riparian Section, Appendix D – County water draft – Is it really happening? Check it. (PM10)

#### Responses

Appendix D was incorporated into the Draft RMP from the *Northwest Forest Plan Aquatic Conservation Strategy Standards and Guidelines*. The section regarding roads management RF-2 (h) states: “Water drafting will be conducted only at sites approved by the BLM and will follow National Marine Fisheries Service (NMFS) guidelines.” During road reconstruction, wildland fire events, and other situations, water may be needed by a variety of agencies for dust abatement, fire suppression, and other purposes. The BLM does not regulate water drafting itself (the State of California regulates water use), but has included this stipulation to prevent damage from occurring to streambanks and riparian areas on public lands by ensuring that equipment only accesses suitable locations.

### 6.3.3.3 *Lands and Realty – Acquisition*

#### Comment Summary

- RMP should do what it can to maintain and encourage wildlife/biodiversity corridors, i.e., connect to USFS areas. Suggest acquiring lands between Headwaters and Six Rivers National Forest to provide eventual biological corridor. (PM23)
- Acquire additional access lot between Seal Rock and Abalone Point on Ocean Drive [in Shelter Cove]. (PM28)

## **Responses**

The Proposed RMP directs the BLM to acquire lands outside the KRNCA boundary after coordination with county governments and local community associations, and only from willing sellers. If lands become available that meet these criteria and form biological corridors to USFS lands, particularly if they support citizen-based conservation initiatives, Humboldt County open space goals, watershed protection for the Mattole River and tributaries, and/or provide habitat continuity for threatened, endangered, or other special status species, the BLM would pursue the possibility of acquisition. Much of the region identified by this comment would also fall outside of the scope of the Proposed RMP, which has a planning area focused in the Mattole Valley and Lost Coast. These lands would be covered under the direction of the Arcata RMP (and amendments) which provide similar direction for acquisitions.

Within the Residential Zone that encompasses Shelter Cove, the BLM may also acquire lands after working with affected local governments and community associations, to provide enhanced visitor services or facilities, or to facilitate protection of greenspace, riparian values, and water sources. In all cases, if these criteria are met, acquisitions will be considered on a case-by-case basis.

### ***6.3.3.4 Lands and Realty – Private Lands/Inholders***

#### **Comment Summary**

- As a hiker, very troubled by presence of air traffic at Big Flat – strongly encourage BLM to close the air strip, interferes with wilderness values. (PM23)
- Take responsibility for source of the environmental damage taking place at Shelter Cove (ex., break in sewage collection system). Be more proactive in addressing these kinds of problems. (PM23)

## **Responses**

BLM does not have the authority to close the air strip at Big Flat. As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings, including the Big Flat air strip, are based on legal deeded rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at a planning level.

The 1970 King Range Act intended that the primary use of the Shelter Cove subdivision be for private ownership and residential use (*House Report on HR 12870*, 1970). The BLM has and will continue to take an active role in working with Humboldt County the California Coastal Commission, and the Shelter Cove Resort Improvement District who have primary planning authority over the private land in the subdivision.

### ***6.3.3.5 Wilderness Characteristics***

#### **Comment Summary**

- More awareness and education needed for wilderness users re: how to behave in the wilderness. (PM05)

- Survey of wilderness character – good job taking inventory. Section 4.4.8 – impacts to areas with wilderness characteristics – mentions thinning but not salvage. Add assessment of that to the final plan and/or clarification of what is meant by “salvage.” (PM22)

### **Responses**

The Proposed RMP would continue and expand upon the BLM’s existing visitor education programs to encourage appropriate behavior in line with a “Leave No Trace” philosophy, particularly in the Backcountry Zone. In addition, development of the visitor carrying capacity program and a permit system for Backcountry use would facilitate these educational efforts by requiring all visitors to obtain information before accessing the area.

Section 5.4.8 in the Proposed RMP describes impacts to inventory units and study areas from Forest Management, and has been amended to include possible impacts from limited salvage projects.

### ***6.3.3.6 Wild and Scenic Rivers***

#### **Comment Summary**

- Less river segments designated Wild & Scenic. (PM02)
- More river segments designated Wild & Scenic. (PM06)

### **Responses**

Comments noted. The determination of suitability for Wild and Scenic River designation is based on specific criteria as shown in Appendix D. The BLM Wild and Scenic River study team considered these criteria along with input from commentors to make the final suitability recommendation. As a result, two segments were added to the streams recommended suitable (the main stem and south fork of Bear Creek). The suitability study serves as background information and a recommendation to Congress; only Congress can designate a stream as a component of the Wild and Scenic River system.

### ***6.3.3.7 Wildlife***

#### **Comment Summary**

- Opposed to reintroduction of species without further discussion/consideration. (PM07)
- Look into marten introduction? Favor seeing them here again. (PM09)
- Consider adding surplus elk from neighboring herds to King Range. Also, eastern wild turkeys introduced to King Range. Survey/inventory species in King Range (perhaps tie into SOD efforts). (PM14)
- Check presence of tailed frog in Big Finley Creek along the coast in summer. (PM23)
- Occasional sightings of bald eagles along the coast in summers. (PM23)
- Plan should do what it can to maintain and encourage wildlife/biodiversity corridors, i.e., connect to USFS areas. Acquire lands between Headwaters and Six Rivers NF to provide eventual biological corridor. (PM23)

## Responses

Only CDFG and FWS have direct authority over wildlife population management (i.e., relocation, removal, or introduction), so reintroductions were not considered as actions or goals under this planning effort. However, the BLM remains open to opportunities for future wildlife management changes, including reintroductions, as long as they are consistent with the goals of the Proposed RMP. The costs and benefits of any species reintroduction proposals would need to be analyzed at the time of the proposal.

Regarding the presence of tailed frogs and bald eagles in the KRNCA: The RMP does not contain a detailed list of all species sightings, or management prescriptions for all species present in the area. Chapter 3 includes a chart of all special status species (Section 3.9.1). The Proposed RMP addresses specific goals, objectives, and actions associated with federally-listed Threatened or Endangered species known to occur in the KRNCA (including bald eagles), as determined through a formal list provided by the FWS as required by Section 7 of the Endangered Species Act.. Non-listed wildlife species are addressed only where there is a specific issue associated with their management (e.g. black bears because of potential conflicts with visitors; game species because of hunting regulations). Other wildlife species are named with their associated habitat in the terrestrial ecosystems section. If a species is not named specifically, it does not mean that management actions will not address habitat improvements that will benefit populations. For example, the management actions to protect and enhance late successional forests and riparian corridors will directly benefit tailed frogs.

Regarding wildlife corridor acquisition, see response 6.3.3.3 above.

### *6.3.3.8 Terrestrial Ecosystems and Vegetation*

#### Comment Summary

- Cooperative burn restoration at Big Flat on exchange for educational values. Make sure any salvage language is tied to ecological criteria. (PM16)
- Help from BLM Botanist, contact Jan Lopes. (PM25)
- Wants more info on how and where to get native plants specific to Shelter Cove/S. King Range. Could BLM sell them? (PM26)
- Need educational process to encourage new Shelter Cove residents not to bring in invasive plants – put info in “welcome basket” for new residents. (PM30)

## Responses

The Proposed RMP contains general criteria guiding fire management in the KRNCA, including restoration after burns. Restoration activities relating to the Honeydew Fire are outside of the scope of this plan, but are ongoing with assistance from a variety of partners. The environmental education program will include information on the fire and its rehabilitation.

Regarding native/invasive plants: Comment noted. The BLM coordinates with Humboldt County and other cooperators in developing weed education materials and will make them available to local residents.

### 6.3.3.9 Forest Management

#### Comment Summary

- Concern regarding changes in the King Range from the original 1974 Plan, especially regarding timber production on the East side. Feels like the government has not lived up to its original goals and direction for the King Range. (PM21)
- If not reclassified to backcountry, do not allow salvage logging of late seral stages in those zones previously listed. (PM22)
- Also analyze Douglas-fir distribution re: causing possible future risk if global warming heats and dries the climate. (PM23)

#### Responses

The 1970 King Range Act, along with the 1974 Management Plan, directed that the KRNCA be managed for a variety of primary and secondary uses, including commercial timber production on portions of the eastern side of the ridgeline. However, a number of legislative and administrative changes have updated this original direction, including the 1973 Endangered Species Act, the 1976 Federal Land Policy and Management Act and associated wilderness study process, and the 1994 Northwest Forest Plan. The Northwest Forest Plan was completed as an interagency effort throughout the northwestern U.S. to conserve old-growth dependent species including the northern spotted owl on federal lands managed by the BLM and Forest Service. Under this plan, the KRNCA was designated as a Late Successional Reserve, a land use allocation intended to conserve a network of old-growth forests, while allowing timber production on certain other lands. This allocation only permits the sale of forest products as a realized from silvicultural treatments implemented to restore late-successional stand character. Yields from these treatments would primarily consist of such products as poles and firewood. The current planning process must be consistent with the Northwest Forest Plan.

The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees/snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

The potential threats from global climate change are not fully understood to the level that the RMP can directly address reasonably foreseeable impacts specific to King Range ecosystems. However, many of the decisions in the RMP will serve to improve the resiliency of resources, such as the reduction of fuel loads in previously harvested stands and continued watershed restoration efforts and storm-proofing of roads. In addition, the Proposed RMP calls for monitoring of resource conditions of the KRNCA to

determine effectiveness of management actions and ongoing trends. This will allow for a level of adaptability in the plan to address unforeseen impacts from changing climate conditions.

### *6.3.3.10 Grazing*

#### **Comment Summary**

- Metal pyramids (exclosures) along grazing leases – coming apart, dangerous, should be checked. (PM01)
- Favors the retirement of unused grazing leases. (PM22)

#### **Responses**

Comments noted; removal of the metal structures, old fencing, and other materials is an on-going effort with BLM personnel and volunteers. The Proposed RMP would administratively change the land use allocations for four expired leases from “available” to “unavailable” to livestock grazing.

### *6.3.3.11 Fire Management*

#### **Comment Summary**

- Does plan address replanting/reforestation after fires? Concerns that open areas could be planted, prefers they open. (PM02)
- Include water canisters at any designated fire pits. (PM19)
- Favors innovative ideas for prescribed fire, more natural fire cycle, and science opportunity for HSU. (PM22)
- Concerned with fire hazards in this area and feels it warrants greater attention re: changing conditions (global warming). Would like to see an analysis of historical ecology and pattern of fire-dependent species on tops of hills/ridges/mountains, but not lower down. (PM23)

#### **Responses**

The Proposed RMP outlines vegetation management goals and fire management goals that would result in a return to historic ecological conditions over the long-term. Under the plan goals, “open” areas that were historically coastal prairies would be managed to encourage retention of prairie vegetation, while forested areas may be replanted or otherwise managed to encourage reforestation.

Fire rings in designated upland campsites include a fuel-free perimeter to minimize the potential for wildfire. Water canisters, while they would provide further fire protection, would also serve as breeding locations for mosquitoes and result in associated health concerns. There are no designated campsites along the Lost Coast Trail, making placement of water canisters impractical. The KRNCA has never recorded a wildfire start from a developed campsite.

The Proposed RMP includes management prescriptions to allow for a more natural fire cycle. Although research opportunities are not specifically identified in the Proposed RMP, the BLM encourages and supports university/partnership studies of public land ecosystems, including fire and fuels.

### ***6.3.3.12 Travel Management***

#### **Comment Summary**

- Prosper Ridge Road – first stretch (250 feet) too narrow and unsafe, needs to be widened, additional drainage or pullout. (PM04, PM09)
- Maintain existing roads but no more of them. Present roads should not erode sediment into streams. (PM08)
- More extensive and maintained road network – at least for BLM and local users use/access (3 or 4 of ridges). (PM11)
- Promote partnerships with county on road improvements – reflectors to separate lanes. (PM33)

#### **Responses**

The Proposed RMP would maintain the existing road network with minimal changes. It includes measures to reduce or eliminate sediment loading into area streams. Specific maintenance concerns, such as widening Prosper Ridge Road, while not specifically addressed in this broad-scale planning effort, will be considered when developing road maintenance or upgrade needs.

The BLM cooperates and assists Humboldt County with road improvements in the King Range as funding permits, and will continue to work with the county.

### ***6.3.3.13 Recreation Resources***

#### **Comment Summary**

- Add designated fire pits (perhaps constructed with rocks/fire ring) at backcountry camping sites, or designate specific locations for fires – Spanish Flat, Big Flat. (PM15)
- Accommodate higher total group sizes. (PM18)
- Supports permit system to give out information – safety concerns. (PM25)
- Tolkán and Horse Mountain campgrounds – keep rustic, drive in developed, no campgrounds in Shelter Cove. (PM26)
- Don't advertise to promote use – strain on roads, etc. (PM11)

#### **Responses**

The Proposed RMP prescribes an adaptive management approach that would require visitors to use designated fire rings and/or campsites in the Backcountry Zone if less restrictive management actions are not effective in preventing wildfire (e.g., backcountry ranger presence, education on campfire site selection and extinguishing, promoting voluntary use of existing user-built fire rings).

The Proposed RMP raises the total number of people in organized groups that may leave from a given trailhead per day from 25 to 30. However, the maximum number of people permitted per group remains at 15 based on the limited size of campsites and the impacts of larger groups on wilderness experiences of the Backcountry Zone.

An interim permit system, and any permit system implemented later as part of a carrying capacity program, will include information for visitors on safety issues while using the Backcountry.

The plan does not include any major changes to Tolkan or Horse Mountain Campgrounds, other than maintenance and basic facility upgrades to meet universal accessibility standards, and to link to a proposed mountain bike trail network.

The BLM is responsible for providing accurate information to the public regarding resources and use opportunities on public lands. In the KRNCA this information is presented via a website and printed visitor guide. The KRNCA and Lost Coast region is a very popular travel destination and is the subject of numerous articles annually in travel and outdoor magazines and newspapers. The BLM has no authority to limit these privately published articles, but provides information to their authors upon request, to help ensure that readers are provided with an accurate depiction of area recreation opportunities, visitor preparation needs, and safety concerns.

#### ***6.3.3.14 Recreation – Mountain Biking***

##### **Comment Summary**

- Mountain bikes don't belong on the trails here. (PM07)
- Allow no new accommodations for mountain bikers. (PM08)
- Support for new mountain bike trails. (PM12)
- Encourage BLM to keep multi-use trails for mountain bikers, possibly build more. Chemise Mountain and King Crest Trail – keep open to mountain bikes. (PM17)
- Favor prohibition of mountain bike use in the backcountry. (PM22)
- Have had 2-3 instances of mountain bikes straying onto private land – nowhere to go South on Chemise Mountain. (PM32)
- No bikes on trails so won't break down and abandon bikes. (PM11)

##### **Responses**

The Proposed RMP would provide opportunities for mountain biking where it is compatible with land use allocations, and includes an objective to expand mountain biking opportunities in the Frontcountry Zone. The plan would allow mountain biking on a permitted basis as a temporary use within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as “ways” in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, (except for a portion of the Cooskie Creek Trail which follows the boundary) and mechanized uses are not considered compatible with long-term management of the Backcountry Zone for wilderness characteristics. The plan proposes development of a mountain bike trail network in the Paradise Ridge

area. Upon completion of this network, or designation of the King Range as wilderness, mountain biking would not be allowed in the Backcountry Zone.

#### ***6.3.3.15 Recreation – Trails***

##### **Comment Summary**

- Develop trails to water sources along LCT/other trails. (PM13)

##### **Responses**

The Proposed RMP would develop springs for potable water sources where feasible at appropriate intervals near upland trails, and allows for construction of side trails to provide access to such water sources.

#### ***6.3.3.16 Recreation – Fees***

##### **Comment Summary**

- Possibly have backcountry use fees to support increased BLM presence on beach, enforcing fire rules, etc. (PM15)
- Opposed to any fees for use of public lands (representing Unit Backcountry Horsemen of CA). (PM18)
- Have out of state visitors pay two times the fee of California residents. (PM24)

##### **Responses**

The BLM is committed to maintaining the KRNCA with the level of fees consistent with policy and budget requirements. If fees are charged, federal policy requires the BLM to treat all visitors equally, regardless of their state of residence.

#### ***6.3.3.17 Recreation – Equestrian Uses***

##### **Comment Summary**

- Horse trailer parking at Woods Gulch – horse pass trailers at gate. (PM25, PM29)

##### **Responses**

The Proposed RMP calls for developing additional parking for horse trailers, where feasible, in the Shelter Cove subdivision. Thank you for the suggestion of Woods Gulch as a potential site.

### ***6.3.3.18 Interpretation and Education***

#### **Comment Summary**

- Create more programs and partnerships w/ schools to restore and teach about local habitat. (PM26)
- Better publicity for interpretive walks/programs - contact Pioneers for docents/volunteers. (PM30)
- Interpretation panels for lighthouse. Get with Carol, work with Lighthouse Society on panels to spruce up lighthouse. (PM31)

#### **Responses**

Comments noted. Thank you for the recommendation for additional docent volunteers. The lighthouse panels have been installed.

### ***6.3.3.19 Public Safety and Emergency Services***

#### **Comment Summary**

- Address Lyme Disease, public safety and awareness, avoidance of ticks, etc. (PM03)
- Would like helispot at wide area near King Peak Road and Shelter Cove Road, allow for emergency helicopter landing, BSB for emergency helicopter use. (PM29)

#### **Responses**

Lyme disease concerns and tick information will continue to be emphasized in BLM public information.

The King Peak-Shelter Cove Road intersection is located on private lands. A helispot is located on public lands near the intersection of Paradise Ridge Road and Shelter Cove Road, and would be available for emergency use. Other public lands, including Black Sands Beach, are available for use in emergencies where suitable alternatives (i.e. Shelter Cove Airport) are not available or feasible for use in the specific emergency situation.

### ***6.3.3.20 Cost/General Management and Administration***

#### **Comment Summary**

- Concern regarding staffing levels required to implement the new plan – will cost too much? (PM11)
- Concern that BLM not adequately managing the areas now (grazing, roads, timber) so why take on more? (PM11)
- Also concern that new plan is too large and complex. (PM21)
- Would like to see more/better coordination with the Sinkyone State Park Plan (ex., common standards for use of LCT). (PM23)

- All of these issues represent writing a comprehensive plan. (PM23)
- Will need more staff to implement plan. (PM11)

### **Responses**

The Proposed RMP represents a continuation of existing management of the KRNCA with changes proposed to manage growing public use demands and additional actions to restore resource conditions. Objectives and actions within the plan will be implemented as staffing and budget levels allow. The plan is intended to guide management of the area for the next twenty years and provide comprehensive and consistent management direction. The RMP is written at a level that matches the complexity of resources, uses, and trends that are anticipated to affect the planning area within this timeframe. The BLM is coordinating with California Department of Parks and Recreation to ensure that the King Range RMP and Sinkyone Wilderness State Park Management Plan have complementary objectives where feasible, and to provide information regarding differences in use requirements.

#### ***6.3.3.21 Community Collaboration/Partnerships/Relations and Economics***

### **Comment Summary**

- Favors work for local contractors. (PM21)
- Need sign at Black Sands Beach directing people to Shelter Cove, Deli, and Main road – Backpackers before getting to parking lot – to business area. (PM24)
- Create more programs and partnerships with schools to restore and teach about local habitat. (PM26)

### **Responses**

The BLM must follow federal laws when soliciting bids for contracts to allow equal participation in the process. However, the BLM routinely uses local contractors for King Range projects, and will continue to do so as allowed by law.

Thank you for the recommendation for improved visitor information/directions.

As staffing levels allow, the BLM will continue to provide local school programs, and increase the delivery of these programs in partnership with local schools where possible.

#### **6.3.4 Individuals Commenting via Mail (813)**

Individualized messages: 39 (email or postal):

<b>Last Name</b>	<b>First Name</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Tracking Number</b>
Alderson	George & Frances	Baltimore	MD	21228	L01

Antonson-Solo	Sandra	Petrolia	CA	95558	L02
Brown	Richard	Petrolia	CA	95558	L03
Campbell	Bruce	Los Angeles	CA	90049	L04
Cardella	Sylvia	Hydesville	CA	95547	L05
Carroll	Chris	Fortuna	CA	95540	L06
Chandler	Ginevra & David Morrow	Ukiah	CA	95482	L07
Coltrin	Ryan	Arcata	CA	95521	L08
Cousins	Robert	Bainbridge Island	WA	98110	L09
Covey	Mr. & Mrs. Elwin	San Diego	CA	92106	L10
Crockett	Kate	Redway	CA	95560	L11
Franzoia	Bob	Sacramento	CA	95822	L12
Green	Fred	Redway	CA	95560	L13
Hall	Thomas	Bakersfield	CA	93308	L14
Heaton	Emily	Ukiah	CA	95482	L15
Huber	Patrick	Davis	CA	95616	L16
Kirkpatrick	William	Santa Clara	CA	95050	L17
Kozarsky	Daniel	Mountain View	CA	94043	L18
Krivanek	Alan	Davis	CA	95617	L19
LaFramboise	Greg	Concord	CA	94521	L20
Madrone	S.	?	CA	?	L21
May	Dottie & Cyril	Long Beach	CA	90803	L22
McAbery	John	Petrolia	CA	95558	L23
Meral	Gerald	Inverness	CA	94937	L24
<a href="mailto:nagiecki@cox.net">nagiecki@cox.net</a>		Eureka	CA	?	L25
Nash	Peter & Judy	Petrolia	CA	95558	L26
Nolan	Susan	Bayside	CA	95524	L27
Palmer	Liana	Los Gatos	CA	95032	L28
Rilla	Michael	Eureka	CA	95501	L29
Roche	Maureen	Petrolia	CA	95558	L30
Ryan	Eddy	Piercy	CA	95587	L31
Sardina	George	Valley Center	CA	92082	L32
Sutherland	Robert	Redway	CA	95560	L33
Sweet	Francis	Petrolia	CA	95558	L34
Tillman	Shawn	Redding	CA	?	L35
Wallace	Douglas	Redway	CA	95560	L36
Waxman	Jonas	Oakland	CA	94611	L37
Wengert	Greta	Bayside	CA	95524	L38
Yates	Gus	Berkeley	CA	94703	L39

Comments in each of the individual letters are summarized by resource area, followed by BLM responses. Persons commenting are listed in alphabetical order. A tracking number is used so that individual comment summaries can be correlated with the commenter. Copies of the comment letters are not

included in this document (as permitted under NEPA requirements) since their volume would add considerably to publication size and cost. However, the comments are available for review at the BLM Arcata Field Office upon request.

### ***6.3.4.1 Management Zones***

#### **Comment Summary**

- Concerned with multiple use zone for areas proposed for wilderness designation. (L01)
- Manage the entire proposed King Range Wilderness [Boxer/Thompson bill] as backcountry/wilderness. (L01, L05, L12, L15, L16, L17, L20, L28, L39)
- Distinction between backcountry & frontcountry is unsupported, concerns for ecological fragmentation. (L04)
- Backcountry/Frontcountry distinction arbitrary in larger context of motorized access. (L11)
- Management zones are not consistent from north to south. (L27)
- Against all new development. (L32)

#### **Responses**

The Proposed RMP adds units 2A and the Squaw Creek portion of 1H to the Backcountry Zone, to protect their wilderness characteristics. The remaining units are proposed for management as part of the Frontcountry Zone, but management actions and uses would not affect future consideration of any units for wilderness characteristic protection or Congressional wilderness designation. The BLM is aware of the pending wilderness legislation S-738, “Northern California Coastal Wild Heritage Wilderness Act.” Nothing in the Proposed RMP would preclude management of the lands proposed in S-738 as wilderness, should this bill be passed into law.

The management focus for the units included in the Frontcountry Zone would be ecological restoration, recreation, and private land interface protection from wildland fire. The management objectives and actions for the management zones (and specifically the Frontcountry Zone) will not contribute to ecological fragmentation; restoration actions proposed for the Frontcountry Zone would reduce existing fragmentation and contribute to the return of more natural conditions. The Frontcountry Zone also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the Fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for “lighter-hand” suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones. Section 4.3 of the Proposed RMP describes the rationale behind the inclusion of lands in a particular zone. The Proposed RMP changed the zoning on lands north of Shelter Cove from Residential to Frontcountry to better depict management actions associated with that area.

The Proposed RMP proposes very little new development, other than trails, within the King Range. Facility improvements would be concentrated at existing developed sites.

#### **6.3.4.2 Visual Resources**

##### **Comment Summary**

- Supports Alternative C. (L02)
- Supports Alternative B. (L26, L30)
- The section of backcountry north of Cooskie Creek should be VRM I status as in Alternative B. (L27)

##### **Responses**

Comments noted. The Proposed RMP has been revised to include the coastal strip north of Cooskie Creek in the Backcountry Zone with VRM Class I status. The Proposed RMP would classify the northern part of the Frontcountry Zone as VRM Class II. This class requires the BLM to retain the existing character of the landscape, allowing for some limited management activities, such as the proposed silvicultural treatments and watershed restoration activities, which would not be allowed under Class I objectives. These treatments would still have minimal and temporary visual impacts on the natural landscape.

#### **6.3.4.3 Cultural Resources**

##### **Comment Summary**

- Supports Alternative C. (L02)
- Supports Alternative A. (L26, L30)
- Suggests fences on cultural sites. (L30)

##### **Responses**

Comments noted. Cultural sites would be fenced where necessary for resource protection.

#### **6.3.4.4 Realty**

##### **Comment Summary**

- Supports Alternative B. (L02, L30)
- Supports Alternative A. (L26)

##### **Responses**

Comments noted.

#### **6.3.4.5 Realty – Water**

##### **Comment Summary**

- Supports Wild & Scenic River designation which would establish a federal water right over such segments. (L04)
- Cumulative impacts for population increase and water rights are not adequately developed. (L09)
- Supports seeking to control and maintain water rights to all waters originating in the KRNCA. (L23)
- BLM should apply for water rights in all fish bearing streams and should not grant private water rights-of-way. (L27)

##### **Responses**

The final decision regarding Wild and Scenic River designation and the establishment of a federal reserved water right rests with Congress.

The Proposed RMP addresses and mitigates impacts, including cumulative impacts associated with population growth, under the discussions of specific resource program and use impacts (Chapters 4 and 5). For example, the plan addresses growth issues relating to recreation use by establishing an objective to develop carrying capacities to limit use. The allocation of water and establishment of water rights is outside of the BLM's jurisdiction and is managed by the State of California. Therefore, this issue is beyond the scope of the plan.

The Proposed RMP would require BLM to secure water rights with all new acquisitions, and to apply for water rights necessary to protect resource values on public lands.

Any water right-of-way applications (allowable only in Frontcountry and Residential Zones) would require an Environmental Assessment under NEPA, and would only allow for diversions during the wet season, not the critical dry summer months resulting in no or negligible impacts to fish bearing streams.

#### **6.3.4.6 Realty – Private Lands/Inholders**

##### **Comment Summary**

- The Draft RMP has an inadequate discussion of impacts (re: NEPA) from air access at Big Flat, which should not be allowed and ownership should be consolidated to public land and from development in Shelter Cove. (L33)

##### **Responses**

As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings, including the Big Flat air strip, are based on legal rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at a planning level, and therefore are beyond the scope of this RMP and associated EIS.

#### 6.3.4.7 *Wilderness Characteristics*

##### Comment Summary

- Encourages the protection of wilderness values. (L01, L30)
- Supports Alternative B. (L02, L15, L30)
- Supports Alternative A. (L26)
- All identifiable units with wilderness characteristics should be managed for those characteristics. (L04)
- The King Range should be managed like a wilderness area, in hopes that Congress will designate as such. (L08)
- Protect areas with wilderness characteristics for potential wilderness designation. (L09)
- Protect all 10,191 acres of land in 11 subunits for wilderness character, believes having none of the alternatives is a failure of NEPA (providing a full range of management alternatives). (L11)
- Supports formalized wilderness. (L21)
- Protect all 10,260 acres of areas with wilderness characteristics adjacent to King Range & Chemise Mountain WSAs. (L23)
- Include more discussion explaining why preferred alternative keeps new acquisitions out of wilderness. (L27)
- The Draft RMP fails to discuss impact of pending Wilderness designation. (L33)

##### Responses

The settlement of *Utah v. Norton Regarding Wilderness Study* clarified that the BLM's authority to expand Wilderness Study Areas or designate additional areas through the RMP process expired in 1993. However, the BLM can make land use allocations through the RMP to manage areas to protect their wilderness characteristics. Within the King Range RMP, the Backcountry Zone represents this allocation. Parcels 1B, 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section (see response 6-1 above), 1HA, and 2B were not included in the Backcountry Zone. These parcels require silvicultural treatments in previously harvested forest stands to improve stand naturalness and reduce fuel loads. These prescriptions would protect the Backcountry Zone from fires originating on private rural subdivisions adjoining the King Range, and protect private lands and structures from fires originating in the KRNCA. Since a primary goal of all silvicultural treatments is to restore previously harvested stands to a late-successional ecological state, the treatments would serve to enhance wilderness characteristics of these lands over the long-term. The Proposed RMP also states that no actions will cause impacts to wilderness characteristics that would affect future consideration for Congressional wilderness designation or BLM management for these characteristics.

Parcels 1A, 1C, and 2C were not included in Alternative B in the Draft RMP because they did not meet the minimum criteria used in the assessment for wilderness characteristics; hence Alternative B proposed

to protect the maximum lands with wilderness characteristics and met the intent of NEPA to provide a full range of reasonable alternatives.

The Proposed RMP (and the preferred alternative in the Draft RMP) calls for protection of acquired parcels for wilderness characteristics; see Section 4.8.3.1.

The BLM completed an Environmental Impact Statement (EIS) which studied the impacts of several wilderness designation alternatives for the KRNCA in 1988. The final determination of wilderness designation and boundaries is a Congressional action, and so is outside of the scope of this plan and EIS. The BLM is aware of the pending wilderness legislation S-738, “Northern California Coastal Wild Heritage Wilderness Act.” Nothing in the Proposed RMP would preclude management of the lands proposed in S-738 as wilderness, should this bill be passed into law.

#### ***6.3.4.8 Wild and Scenic Rivers***

##### **Comment Summary**

- Supports Alternative B. (L02, L26, L30)
- Recommends adding eligible segments of Mattole River - headwaters to Honeydew Creek, Squaw Creek, upper and lower North Fork to Alternative C for Wild and Scenic Rivers. (L03)
- Supports more extensive Wild & Scenic River designations and better watershed protection. (L04)
- Recommends that as many segments as possible should be protected as Wild and Scenic Rivers. (L09)
- Recommends maximum protection to every stream and river in KRNCA with a viable salmonid population via Wild & Scenic designation. (L23)
- Suggests Main Stem Bear Creek and North Fork Bear Creek river segments be included in Wild and Scenic River system. (L36)

##### **Responses**

The Proposed RMP has been revised to recommend a total of ten stream segments as suitable for inclusion in the National Wild and Scenic River System, including both the Main Stem and North Fork of Bear Creek. Appendix D of the Proposed RMP outlines the criteria used by the BLM to study streams for Wild and Scenic River suitability. One of these criteria is to consider stream segments in a regional context. Although many of the streams in the King Range exhibit significant values that meet eligibility criteria, the study team has determined that the values are not at a level that would make these segments worthy additions to the NWSRS when viewed in the context of the KRNCA as a whole, or within the California Coastal Range Physiographic Province (which serves as the regional context). The Proposed RMP would protect resource values of area streams where they cross public lands regardless of their suitability for Wild and Scenic River designation. The Mattole River upstream from Honeydew Creek and the lower North Fork of the Mattole are bordered by private lands, and so are outside of the BLM’s management jurisdiction. The Proposed RMP contains suitability recommendations, and only Congress can designate a stream segment as part of the National Wild and Scenic Rivers System.

#### **6.3.4.9 ACECs**

##### **Comment Summary**

- Supports Alternative C. (L02, L26, L30)
- Lower part of Mill Creek must especially be managed to protect wilderness characteristics, designate as ACEC/RNA. (L04)

##### **Responses**

The Proposed RMP includes special management protections for the Mill Creek ACEC's watershed and old-growth forest values. Some of the lands within this area were logged prior to public acquisition and require silvicultural treatments to assist the area's ecological recovery. The Proposed RMP states that no actions would cause long-term impacts to wilderness characteristics. By improving natural forest conditions, the treatments would enhance wilderness characteristics in the long-term.

#### **6.3.4.10 Aquatic Systems and Fisheries**

##### **Comment Summary**

- Supports Alternative C with a 5 year cap on restoration. (L02)
- Figure 2-11 does not indicate coho present in Squaw creek while a CDFG survey on 6/24/03 found coho present. (L03)
- The preferred alternatives for forest and fire management as well as transportation will have detrimental effects of threatened species habitat, particularly on aquatic species habitat. (L09)
- Supports Alternative B. (L26, L30)

##### **Responses**

Forest restoration actions in the existing stand types and age classes require successive stand treatments to be effective. These treatments would likely extend beyond the life of this plan. Therefore a five-year timeframe limit would not allow for meeting the plan objectives for restoring forests to a more natural condition. Likewise, watershed restoration activities are completed over multiple years, contingent on funding availability, and to minimize the risk of significant sediment/fisheries impacts from extensive treatments.

The Draft RMP map 2-11 has been updated for the Proposed RMP to correct any fisheries data errors.

The RMP/EIS process includes consultation with the Fish and Wildlife Service and NOAA Fisheries to ensure that management actions do not harm threatened or endangered species. The RMP includes a Biological Assessment which outlines actions that would be taken to protect aquatic and terrestrial species. Specific on-the-ground projects such as fuels treatments and road improvements would require site-specific Biological Assessments and additional consultation prior to implementation.

### 6.3.4.11 *Wildlife*

#### Comment Summary

- Recommends Alternative C. (L02, L26, L30)
- There is little discussion of marbled murrelet, suggest considering current and potential nesting and social activity habitat to encourage species. (L04)
- Against establishing camping corridors (50 yards to each side) at mouths of all creeks and streams along LCT to protect wildlife. (L23)
- Include consideration of fishers which are no longer considered old-growth dependent; and is against the introduction of turkeys. (L27)
- There is no discussion of impacts of introduced species such as turkeys and pigs. (L33)
- There is an inadequate discussion of long-term viability of wildlife populations; missing tailed frog, marten, and goshawk; as well as insufficient coverage of bald eagles, marbled murrelets, brown pelican, California condor, elephant seal and northern fur seal. (L33)
- Against the introduction of wolves and supports the control of mountain lions, concern predators will roam outside public lands. (L34)
- Eradicate all Texas turkeys from KRNCA; establish eradication as a management goal. (L36)
- Cites report of Sinkyone herd of Roosevelt elk expanding into KRNCA. (L38)
- The Draft RMP overlooks management of mountain lion (influence on visitors, also deer and elk populations). (L38)
- Several listed species are overlooked in the Draft RMP. (L30, L38)

#### Responses

Only CDFG and FWS have direct authority over wildlife population management (i.e., relocation, removal, or introduction), so reintroductions and other population management actions were not considered under this planning effort. However, the BLM remains open to opportunities for future wildlife management changes, including reintroductions, as long as they are consistent with the goals of the Proposed RMP. The costs and benefits of any species reintroduction proposals would need to be analyzed at the time of the proposal.

Pigs have not historically been an issue in the KRNCA, as the habitat they use is mostly found on private lands in the region. A small population of turkeys inhabits a minor part of the KRNCA. However, suitable turkey habitat is limited, so they are not expected to increase substantially during the life of this plan. There are no known impacts from turkeys on native species in the KRNCA. If wildlife monitoring indicates that impacts are occurring, the BLM will work with CDFG to address the issue.

With regard to marbled murrelets, surveys have not detected occupancy and only one “fly-over” was documented which is presumed to be associated with nearby Humboldt Redwoods State Park. Although critical habitat for murrelets has been designated within the boundaries of the King Range, the offshore winds maintain a warm, dry climate that mimics inland conditions that are generally considered

unsuitable, rather than the coastal fog-dominated habitat with which murrelets are ordinarily associated. Similarly, surveys for marten and fishers have not found any occurrence of these species.

Regarding the presence of tailed frogs, marten, goshawk, as well as insufficient discussion of bald eagles, marbled murrelets, brown pelican, California condor, elephant seal and northern fur seal in the Draft RMP: The RMP does not contain a detailed list of all species sightings, or management prescriptions for all species present in the area. Chapter 3 includes a chart of all special status species (Section 3.9.1). The Proposed RMP addresses specific goals, objectives, and actions associated with federally-listed Threatened or Endangered species known to occur in the KRNCA (including bald eagles), as determined through a formal list provided by the FWS as required by Section 7 of the Endangered Species Act. Non-listed wildlife species are addressed only where there is a specific issue associated with their management (e.g. black bears because of potential conflicts with visitors; game species because of hunting regulations). Other wildlife species are named with their associated habitat in the terrestrial ecosystems section. If a species is not named specifically, it does not mean that management actions will not address habitat improvements that will benefit populations. For example, the management actions to protect and enhance late successional forests and riparian corridors will directly benefit tailed frogs.

#### *6.3.4.12 Terrestrial Ecosystems and Vegetation*

##### Comment Summary

- Supports Alternative B. (L02)
- Supports Alternative A. (L26, L30)
- The Redwoods to Sea Corridor as a biological linkage, not recreational. (L04, L11)
- The impact of global warming is not considered. (L09)
- Expresses support for the attention in the plan to coastal prairies as endangered habitat. (L27)
- The discussion of rare plant species is inadequate. (L33)
- There is no discussion of impacts of introduced species such as pampas grass. (L33)
- Is against the use of pesticides and herbicides. (L30)

##### Responses

Comments noted.

The Draft RMP makes no reference to the Redwoods to Sea Corridor as a recreational corridor. This area is outside the planning area boundary and thus is outside the scope of this RMP.

The potential threats from global climate change are not fully understood to the level that the RMP can directly address reasonably foreseeable impacts specific to King Range ecosystems. However, many of the decisions in the RMP will serve to improve the resiliency of resources, such as the reduction of fuel loads in previously harvested stands and continued watershed restoration efforts and storm-proofing of roads. In addition, the Proposed RMP calls for monitoring of resource conditions of the KRNCA to determine effectiveness of management actions and ongoing trends. This will allow for a level of adaptability in the plan to address unforeseen impacts from changing climate conditions.

Section 4.13.3.1 contains management objectives associated with the protection of all special status species in the KRNCA.

Pampas grass is considered a non-native invasive species, and so is addressed in section 4.13.4.7. The Proposed RMP only allows for herbicide use in limited situations where manual removal of invasive plant species is not feasible, and the spread of these plants would cause extensive ecological damage. Any proposal to use herbicides would require additional environmental analysis.

### ***6.3.4.13 Forest Management***

#### **Comment Summary**

- Expresses sentiments against logging and road building (L01, L10, L16, L17, L18, L19, L20, L22, L24, L28, L29, L30, L32, L37, L39)
- Recommends against salvage logging. (L04, L23, L30, L36)
- Recommends against all logging. (L14, L30)
- Supports Alternative C with a 5 year cap on restoration. (L02)
- Prohibit salvage logging at the Lower park of Mill Creek. (L04)
- Suggests intensive pursuit of salvage logging will not achieve goal of encouraging old-growth and late-successional forests. (L11)
- Opposed to opening of old logging roads or building new ones. (L11)
- Supports Alternative B. (L11, L26, L30, L36)
- Suggests timber harvesting was promised by original KRNCA Act, small yearly volume and well-regulated contracts should be included in forest management. (L13)
- Supports the Draft RMP silvicultural proposals. (L27)
- Suggest that Alternative B for salvage logging, as the function of large expanses of dead trees is not well enough understood. (L27)
- Opposed to tree-planting in backcountry. (L27)

#### **Responses**

The 1970 King Range Act, along with the 1974 King Range Management Program, directed that the KRNCA be managed for a variety of primary and secondary uses, including commercial timber production on inland portions of the area. However, a number of legislative and administrative changes have updated this original direction, including the 1973 Endangered Species Act, the 1976 Federal Land Policy and Management Act and associated wilderness study process, and the 1994 Northwest Forest Plan. The Northwest Forest Plan was completed as an interagency effort throughout the northwestern U.S. to conserve old-growth dependent species including the northern spotted owl on federal lands managed by the BLM and Forest Service. Under this plan, the KRNCA was designated as a Late Successional Reserve (LSR), a land use allocation intended to conserve a network of old-growth forests,

while allowing timber production on certain other lands. This allocation only permits the sale of forest products as a realized from silvicultural treatments implemented to restore late-successional stand character. Yields from these treatments would primarily consist of such products as poles and firewood. The current planning process must be consistent with the Northwest Forest Plan.

Forest restoration actions in the existing stand types-age classes require successive stand treatments to be effective. These treatments would likely extend beyond the life of this plan. Therefore a five-year timeframe limit would not allow for meeting the plan objectives for restoring forests to a more natural condition.

The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees/snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

Any road re-opening would be temporary in nature and followed by restoration within 12-18 months, and would only occur in very limited circumstances where environmental analysis shows direct benefit to improving late-successional forest characteristics and no major watershed impacts; see Section 4.14.5 for details. In some cases these actions may serve the dual purpose of removal and restoration of old logging roads.

Regarding the planting of trees in the Backcountry Zone, the Proposed RMP does not call for any treatments (including tree plantings) except for very limited instances; for example, some limited planting is being conducted to rehabilitate fire lines constructed during the Honeydew Fire.

#### ***6.3.4.14 Special Forest Products***

##### **Comment Summary**

- Supports Alternative B. (L02, L26, L30)
- Recommends permits to harvest mushrooms for private non-commercial collectors only. (L23)
- Comments that the Draft RMP does not mention commercial seed-tree harvest. (L27)

##### **Responses**

Existing special forest products permits are issued to small family collectors for modest levels of harvest, and mostly to people belonging to low-income and/or minority populations. A theme identified during the public scoping process for the Draft RMP was to allow for economic opportunities for local

communities. Allowance for continued harvesting of these products provides both local economic opportunities and addresses environmental justice concerns for the area. The Proposed RMP would include monitoring of harvest levels to ensure resource values are protected. It also carries forward a Native American beargrass area where commercial beargrass harvesting would not be permitted.

Regarding commercial seed tree harvest, it is assumed that the commentor was referring to the harvest of cones and other vegetative seeds, and not to “seed tree harvesting,” a silvicultural technique that would not be used in the KRNCA because of its status as a Late Successional Reserve. The harvest of cones and other vegetative seeds would be permitted under a Special Forest Products permit.

### **6.3.4.15 Grazing**

#### **Comment Summary**

- Supports Alternative B. (L02, L26, L30, L36)
- Suggest eventually eliminating all grazing from KRNCA, negative impacts outweigh the benefits when current permit holders retire or give up leases, those allotments should be terminated. (L23)
- Supports grazing section but questions how cattle will be kept out of redefined portion of Spanish Flat. Also questions whether Howe 1999, studying midwestern tallgrass prairie, applies here. (L27)
- Recommends against commercial grazing. (L29, L30)
- Asserts Draft RMP is incorrect in saying that Big Flat allotment was never grazed, cites sheep grazing there. (L33)
- Asserts the Draft RMP fails to discuss problem of livestock trespass and associated environmental impacts. (L33)

#### **Responses**

The King Range Act directs the BLM to consider all legitimate uses of resources on public lands, including grazing, in planning and management of the area (PL 91-476). The Proposed RMP would change the Spanish Flat allotment boundary to exclude grazing from the coastal terraces and therefore would eliminate any impacts to cultural resources. Cattle have already been excluded from this area with upland fencing. The plan would allow for continued grazing while protecting water and vegetation quality on the remaining grazing allotments. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends. Grazing is also considered to be an important part of management of the coastal prairie ecosystems, to keep them open from forest encroachment (see Section 3.12).

The RMP statement that the Big Flat area was never grazed was intended to indicate that the land was not grazed as an allotment under BLM ownership. The land was grazed prior to BLM acquisition.

There have been past instances of cattle trespass in the KRNCA. However, the BLM has worked extensively with existing permit holders to construct and maintain fences, and limit seasons of use, and will continue to do so to prevent future trespass..

#### ***6.3.4.16 Fire Management***

##### **Comment Summary**

- Supports Alternative C with no broadcast burning. (L02)
- Supports Alternative B. (L26, L30)
- BLM should not to manage for 20 percent seral stage, fire danger. (L04)
- Fuels reduction work should only occur in real interface areas, rather than wild backcountry (even if zoned frontcountry) -- need more study to show that these efforts actually reduce (rather than promote) fire danger. (L04)
- Clarify the meaning of "limit the use of mechanized equipment" in WSA for firefighting, as heavy equipment should not belong in wilderness. (L27)
- Shaded fuel breaks are incompatible with wilderness. (L27)
- Provide proper oversight when involving residents in fuels reduction to avoid highgrading larger trees. (L27)
- Against broadcast burns. (L30)
- Favors more fire protection. (L34)

##### **Responses**

A 20 percent early seral stage forest is an estimate of the natural conditions in the King Range forest ecosystem prior to human intervention. This estimate is based on existing conditions in undisturbed forests remaining in the area. Management for a lower percentage of early seral stage forest would be difficult or impossible as the historic stand structure developed based on natural site limitations. The Proposed RMP would accelerate the establishment of late seral stage forests in cutover stands through silvicultural treatments and fuels reductions. This will serve to reduce the current level of early seral forest which is currently much higher than 20 percent. This would also reduce the danger of a stand replacing fire.

Fuels reduction projects would be prioritized in cutover stands with high fuel loads located adjacent to private residential lands.

BLM national level policy provides specific direction and restrictions on allowable uses of mechanized equipment in Wilderness Study Areas. These limitations are outlined in H-8550-1, *Interim Management Policy for Lands Under Wilderness Review*.

Shaded fuel breaks, although they cause some modest impacts to naturalness, would reduce impacts to the area's wilderness characteristics in the long-term by providing defensible containment perimeters for fire, thus reducing the need for dozer line construction during wildfire events that threaten private

property or public safety. Having several defensible fuel breaks would also increase the BLM's capability for reestablishment of the natural role of fire in the Backcountry Zone.

Any permits issued to private landowners allowing fuels treatments on adjoining BLM land would contain specific stipulations on the types and sizes of vegetation to be removed, including restrictions on cutting old-growth or other large-diameter trees.

Broadcast burning would not be used in situations where there is risk of escape onto private lands. In these situations, mechanical fuel reduction would be used.

#### ***6.3.4.17 Travel Management***

##### **Comment Summary**

- Supports Alternative B. (L02, L26, L30)
- The vehicle count for Mattole Road (p. 2-131, Table 2-20) is too high. (L03)
- Close cherrystemmed roads and decommission old/failing/collapsing roads. (L04)
- Close the Smith-Etter road. (L04)
- All year-round roads should be kept open and properly maintained for runoff; seasonal roads open May 1<sup>st</sup>. (L23)
- Short spur roads less than 2 miles long should be converted to trails. (L23)
- Last 0.6 miles of Windy Point Road should be closed to all vehicle traffic due to steepness of road & poor soil quality. (L23)
- Recommends a complete Environmental Assessment of all roads before finalizing transportation plan. (L23)
- There is confusion with King Peak Road and King Range Road -- consider renaming one. (L27).
- Against the creation of new roads. (L30)
- Against opening Johnny Jack Road. (L30)
- Supports the need for more roads. (L34)

##### **Responses**

The vehicle count for Mattole Road was obtained from the Humboldt County Regional Transportation Plan. Although the vehicle count may have increased, this plan represents the best available data at this time.

The Proposed RMP would provide for continued decommissioning of unused roads.

The Smith-Etter Road provides for public access to three trailheads, as well as for legally required landowner access to private inholdings. Therefore, the Proposed RMP would leave this route open to seasonal use.

The Proposed RMP calls for converting several rehabilitated roads into trails including the Queen Peak Mine Road. Development of specific spur routes as trails would be permitted if they meet the recreation management objectives of the RMP. Other roads, including spurs, would be available for non-motorized use, even if not developed specifically as trails.

The Proposed RMP would keep the Windy Point Road open to public access. Closure during the winter season (November 1-March 31) and allowance for extended closure during longer wet seasons, as well as continued maintenance, would serve to minimize impacts to the road bed from public use.

The Proposed RMP includes an Environmental Impact Statement that assesses impacts from the proposed Travel Management plan (Section 5.11.12).

Thank you for the recommendation to change confusing road names. Comment noted.

No new permanent or public use roads would be created under the Proposed RMP.

The Johnny Jack Ridge Road would remain closed under the Proposed RMP.

#### ***6.3.4.18 Recreation Resources***

##### **Comment Summary**

- Supports Alternative A. (L30)
- Supports Alternative A with no fees, just a usage cap. (L02)
- Supports Alternative B. (L26, L27)
- Suggest developing more water sources for public safety along trails (such as King Peak). (L08)
- Recommends not establishing camping corridors (50 yards to each side) at mouths of all creeks and streams along LCT to protect wildlife. (L23)
- Suggests there is no need for a permit system in northern portion of King Range. (L23)
- Disagrees with changing deer season to exclude Labor Day -- supports Preferred Alternative of managing to prevent conflicts. (L27)
- Supports fences of natural material for wildlife & aesthetic reasons. (L27)
- Emphasizes clarification is necessary in defining "developing springs" and "potable water." (L27)
- Supports Alternative B with bear-proof locker storage in backcountry. (L27)
- Recommends signage to be kept to a minimum in backcountry. (L27)
- Supports limiting use of low-flying aircraft. (L27)
- Suggests KRNCA should be closed to loose/off-leash dogs, and that the Draft RMP fails to discuss this. (L33)

- Supports reserving King Range beaches for highest and best uses only, which as judged by numbers of users is individual hiking -- other uses should be excluded. (L33)
- Favors more campgrounds and easier accessibility by older population. (L34)
- Favors allowances for minimum levels of recreation use. (L36)

## **Responses**

The Proposed RMP includes management actions to provide upland water sources.

There is no evidence to indicate that camping at the mouths of Lost Coast streams has had more than negligible impacts on wildlife habitat. Public use is concentrated at the mouths of streams, while the majority of stream mileage receives almost no visitation. This provides extensive areas for terrestrial wildlife use. Public use during winter steelhead and salmon migration is minimal, so again impacts are negligible.

Use impacts and visitor conflicts, while lower on the northern Lost Coast Trail, still occur. Also, administration of a permit system for only a portion of the trail would be difficult to administer and enforce. Therefore the proposed plan provides for a permit system for the entire trail.

The provision to move the deer hunting season to after Labor Day has been removed from the Proposed RMP.

Spring developments typically involve concentration and delivery of water at existing springs that otherwise would not be useable for obtaining water. Development includes small excavations with hand tools, and placement of filter fabric, gravel, and an outlet pipe. Site-specific designs and environmental analysis would occur prior to any developments.

The Proposed RMP calls for limiting signing in the Backcountry Zone to directional and safety signs.

Although the BLM does not have authority to regulate aircraft, the Proposed RMP includes a goal of working with Humboldt County and the FAA to minimize low-flying aircraft use over the King Range Backcountry Zone.

BLM regulations require dogs to be kept on a leash in developed sites such as campgrounds, and under control in all other locations.

The Proposed RMP would manage the Backcountry Zone for a variety of non-mechanized uses in keeping with the goals of managing the area for wilderness characteristics.

The BLM is retrofitting or reconstructing all facilities, including campgrounds, to provide for universal accessibility. All campgrounds in the King Range except for Horse Mountain have been reconstructed for easier access. In addition, the Proposed RMP allows for development of easier access trails in the Shelter Cove/Hidden Valley area.

The Proposed RMP's management objectives call for establishing carrying capacities for recreation use levels to ensure that the area does not become overcrowded.

#### ***6.3.4.19 Recreation – Mountain Bicycling***

##### **Comment Summary**

- No designated single-track, single use bike trails (allow on old roads if holding up ok). (L04)
- Supports continued use of existing trails by mountain bikers. (L06)
- The plan should be more inclusive of mountain bikers on King Range trails. (L07)
- Against describing mountain biking as a “non-traditional,” “special,” or “emerging” activity but rather as an established use. (L07)
- Requests acknowledgement of BLM’s *National Mountain Bicycling Strategic Action Plan* (2002), specifically to identify and implement diverse mountain biking opportunities. (L07)
- Creation of mountain bike trails would be pointless if area is designated wilderness. (L08)
- Supports Alternative C, opposed Alternative B for plan as it is imperative that bicyclists not be excluded from the region. (L25)
- Encouraging mountain bike use in frontcountry will draw them to the backcountry; also comments that the bikeway on shoulder of Shelter Cove Road is needed for safety. (L27)
- Against mountain bikes on trails, especially concerned with its role in causing erosion. (L29)
- Bicycles and hang-gliders should not be in backcountry, represent visual pollution. (L33)
- Supports Alternative C, especially allowing mountain bike access while limiting non-motorized use/access. (L35)

##### **Responses**

The Proposed RMP would provide opportunities for mountain biking where it is compatible with land use allocations, and includes an objective to expand mountain biking opportunities in the Frontcountry Zone. The plan would allow mountain biking on a permitted basis as a temporary use within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as “ways” in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, except a portion of the Cooskie Creek Trail which borders the WSA. Mechanized uses are not considered compatible with long-term management of the WSA and overlapping Backcountry Zone for wilderness characteristics. The plan proposes development of a mountain bike trail network in the Paradise Ridge area. Upon completion of this network, or designation of King Range wilderness, mountain biking would not be allowed in the Backcountry Zone.

Mountain biking was discussed on page 2-145 of the Draft RMP. Mountain biking was not listed as a major activity in the Draft Plan because historically use levels have been very limited relative to many other activities in the KRNCA. Due to the mountain biking community’s interest in working with the BLM to expand opportunities in the KRNCA, the lack of suitable trails in the area, and the level of demand for additional riding areas, this activity has been added as a major focus on management in the Frontcountry Zone.

Comment noted. The references to mountain biking among emerging uses have been changed, and the Proposed RMP has been clarified. The Proposed RMP has identified mountain biking as a temporary use within the Backcountry Zone as it is not considered to be compatible with long-term management goals for this part of the KRNCA.

Based on currently low levels of use, resource impacts of mountain bikes to trail treads, watersheds, etc., are not considered an issue in the KRNCA and are not addressed as an impact in the Proposed RMP.

The Proposed RMP is consistent with the *National Mountain Bicycling Strategic Action Plan*. Under the Proposed RMP, the BLM would proactively work with the mountain bike community to implement mountain biking opportunities where they are compatible with the management zone goals and objectives and national policy relating to WSAs. A reference to the strategic plan has been added to the mountain biking discussion in Chapter 3.

Regarding a Shelter Cove Road bike lane: Comment noted. The Shelter Cove Road is under the jurisdiction of Humboldt County. The BLM works with the County to accommodate projects on county roads that cross public lands.

Hang gliding is not currently a known use in the King Range Backcountry Zone. The only hang gliding site on public lands is in the Frontcountry Zone (Strawberry Rock). The Proposed RMP would not allow for mechanized transport in the Backcountry Zone. Hang gliders are considered to be mechanized transport devices, and so would not be permitted.

#### **6.3.4.20 Recreation – Trails**

##### **Comment Summary**

- Encourage development of trails with gentler grades and loops. (L06)
- Supports responsible use of trails by everyone. (L06)
- Encourage greater coordination with Sinkyone Wilderness State Park's RMP, specifically linking trails. (L07)
- Suggest a failure to coordinate plan adequately with Sinkyone Wilderness State Park; should not have conflicting sets of regulations on trails. (L33)

##### **Responses**

The Proposed RMP includes an objective for developing easier access trails within the Frontcountry Zone. The BLM is coordinating the King Range RMP process with Sinkyone Wilderness State Park planning process to ensure compatible/complementary management. Where regulations vary between the areas, they will be clearly posted at trailheads.

#### ***6.3.4.21 Recreation – Motorized Watercraft***

##### **Comment Summary**

- Emphasizes that motorized watercraft incompatible with wilderness. (L27)
- Suggests outlawing jet skis at Mattole Estuary. (L30)

##### **Responses**

The Proposed RMP would not allow motorized watercraft to land on the coast within the Backcountry Zone (except in emergencies), or to be used in the Mattole Estuary.

#### ***6.3.4.22 Recreation – Fees***

##### **Comment Summary**

- Opposes user fees. (L11, L30)
- Opposes fee for overnight use of backcountry. (L27)

##### **Responses**

Comments noted. The BLM is committed to maintaining the area with the level of fees consistent with policy and budget requirements.

#### ***6.3.4.23 Recreation – Horse / Equestrian Use***

##### **Comment Summary**

- Supports continued use of existing trails by equestrians. (L06)

##### **Responses**

Comment noted. The Proposed RMP allows continued use of all trails by equestrians, with limits on group size that are commensurate with those applied to other user groups.

#### ***6.3.4.24 Interpretation and Education***

##### **Comment Summary**

- Supports Alternative A. (L02, L26, L30)
- Suggests adding informative sign at beach trailheads up to ridges regarding water availability. (L08)

##### **Responses**

Comments noted.

#### *6.3.4.25 Public Safety and Emergency Services*

##### **Comment Summary**

- Suggest developing more water sources for public safety along trails (such as King Peak). (L08)
- Recommends warning visitors about dangers of ticks, Lyme disease and stream crossings on LCT in winter. (L23)
- Favors more police protection. (L34)

##### **Responses**

Comments noted. The Proposed RMP calls for development of additional water sources where feasible. The BLM would continue to provide and improve comprehensive safety information and law enforcement ranger patrols to protect visitors. Current BLM visitor information materials include safety as a major topic. This emphasis will continue and be improved where possible.

#### *6.3.4.26 Cost/General Management and Administration*

##### **Comment Summary**

- Petrolia "inholder" wants King Range to stay as natural and wild as possible. (L02)
- Prefers Alternative B, with some exceptions (some areas are environmentally inferior to other alternatives). (L04)
- The set of policies drawn from alternatives could be presented more clearly as a single section of text. (L11)
- If there are future budget cuts for King Range management, first make cuts in areas that do not promote long term goal of keeping King Range as wild and primitive as possible (such as grazing, closing roads, or limiting length of driving season). (L23)
- Hire locals for any improvements. (L26)
- Draft RMP does not appear to comply with CEQA in terms of adopting the least environmentally damaging feasible alternative, also discussion of cumulative impacts inadequate for compliance with CEQA. (L33)

##### **Responses**

Regarding the wild and natural character of the King Range: This is a primary purpose of the legislation and policies guiding KRNCA management, and is reflected in the goals, objectives, and actions of this RMP process.

The plans and policies in the Proposed RMP have been reformatted from the Draft RMP version in an effort to make the text clearer and easier to understand.

The BLM is required to follow federal laws when soliciting bids for contracts to allow equal participation in the process. However, the BLM routinely uses local contractors for King Range projects, and will continue to encourage use of local contractors as allowed by law.

Because this is a federal project, the RMP is subject to the requirements of the National Environmental Policy Act (NEPA), and not CEQA. Under NEPA, the BLM is not required to adopt the environmentally preferable alternative. However, the Proposed RMP includes a balance of actions that will allow for continued public uses of the KRNCA as mandated by the 1970 King Range Act, while protecting and enhancing the quality of the environment through forest and watershed restoration activities. Many actions in the plan will result in beneficial environmental impacts when compared to baseline conditions, while others result in only negligible to minor negative impacts. No significant negative impacts have been identified. Where cumulative impacts would occur, they are analyzed as required under NEPA (see Chapter 5).

#### ***6.3.4.27 Community Collaboration/Partnerships/Relations and Economics***

##### **Comment Summary**

- Concerned that economic portion of document suggests that locals want logging to support local economy. (L04)
- Requests an extension to the comment deadline. (L33)

##### **Responses**

The Draft RMP was not intended to create an impression of strong local support (or opposition) for logging. The Economic Context (Section 2.3.6 in the Draft RMP) discusses regional trends in lumber-related jobs within Humboldt County to provide an overview of the regions economy and the impacts of management of the King Range.

The BLM provided for a 90-day comment period on the Draft RMP, from January 16, 2004, to April 16, 2004. This is longer than the 60-day comment period required by NEPA.

#### **6.3.5 Form Messages**

Comments in both of the form letters are summarized by the BLM below, followed by BLM responses. Persons commenting are listed in alphabetical order. Copies of actual comment letters are available from the BLM Arcata Field Office upon request.

##### ***6.3.5.1 Form Message 1: letters regarding mountain bicycles (4):***

<b>Last Name</b>	<b>First Name</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>
Dobrowolski	Christine	Arcata	CA	95521
Gratz-Weiser	Rowan	Arcata	CA	95521
McDaniel	Patrick	Arcata	CA	95521
Swaffer	Wes	Arcata	CA	95521

### Comment Summary

- Supports mission statement developed for management of the area and that mountain bicyclists can be a part of this commitment to the preservation of the KRNCA.
- Indicates 1974 Management Program was developed prior to the invention of mountain bicycles.
- States that studies have shown mountain bicycles as having about the same impact on trails as do hikers and backpackers, and less impact on trails than horses and pack animals.
- Expresses desire to continue using the KRNCA for mountain bicycling.

### Responses

Comments noted. The Proposed RMP would provide opportunities for mountain biking where it is compatible with land use allocations, and includes an objective to expand mountain biking opportunities in the Frontcountry Zone. The plan would allow mountain biking on a permitted basis as a temporary use within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as “ways” in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, except a portion of the Cooskie Creek Trail which borders the WSA. Mechanized uses are not considered compatible with long-term management of the WSA and overlapping Backcountry Zone for wilderness characteristics. The plan proposes development of a mountain bike trail network in the Paradise Ridge area. Upon completion of this network, or designation of King Range wilderness, mountain biking would not be allowed in the Backcountry Zone.

Based on the current low levels of use, resource impacts of mountain bikes to trail treads, watersheds etc. are not considered an issue in the KRNCA and are not addressed as an impact in the Proposed RMP. Compatibility with management for wilderness characteristics is the rationale for limiting mountain bike use in the Backcountry Zone and for transitioning this use into the Frontcountry Zone. The Proposed RMP text has been updated to replace “non-motorized” with “non-mechanized” to more clearly reflect the land use allocation of the Backcountry Zone to be managed for wilderness characteristics. The Plan seeks to develop a mountain bike trail system in the Frontcountry Zone that would mitigate the long-term impact of not allowing mountain bikes in the Backcountry Zone.

#### *6.3.5.2 Form Message 2: form letters regarding wilderness (769):*

Last Name	First Name	City	State	Zip Code
a'Becket	Suzanne	Cupertino	CA	95014
Adams	Evelyn	McKinney	TX	75071
Adams	Marsha	Sunnyvale	CA	94087
Afzal	Kenneth	Santa Monica	CA	90401
Agredzno	Rene	Eureka	CA	95503
Aguilar	Felix	Long Beach	CA	90804
Aguilar	Toni	Annapolis	MD	21401
Aguirre	Patricia	Los Angeles	CA	90042
Ali	Hana	San Francisco	CA	94117
Allen	Peter	Charlottesville	VA	22903

Alosi	Jeanette	Chico	CA	95928
Alosi	Jeanette	Chico	CA	95928
Althoff	Eric	Los Angeles	CA	90026
Amelang	Loren	Philo	CA	95466
Amelotte	Patti	Gardena	CA	90249
Amon	Rachel	Rochester	NY	14624
Anderson	Colin	Arcata	CA	95521
Anderson	Neal	Altadena	CA	91001
Anderson	Connie	American Canyon	CA	94503
Ankney	Jennie	San Diego	CA	92115
Arblaster	Jacqui	Los Angeles	CA	90066
Archer	Donald	Cambria	CA	93428
Armin-Hoiland	Joel	Bayside	CA	95524
Armstrong	Thomas	Oreland	PA	19075
Aulakh	Arjan	Venice	CA	90291
Ayag	Sarah	Santa Rosa	CA	95407
Ayag	Sarah	Santa Rosa	CA	98407
Badoza	Mariamelia	Sacramento	CA	95824
Bagatelle-Black	Forbes	Saugus	CA	91350
Bailey	Diane	Oakland	CA	94610
Baker	Nicholas	Glendale	CA	91205
Baldomero	Beau	West Hills	CA	91307
Baldwin	Val	Capitola	CA	95010
Balfour	Peter	Key West	FL	33040
Ballentine	Eusebius	Honesdale	PA	18431
Barfield	John	Atlanta	GA	30329
Barnett	Cheryl	Santa Monica	CA	90405
Barrett	Frances	Oregon House	CA	95962
Bartel	E	Anaheim	CA	92805
Barth	Teresa	Cardiff By The Sea	CA	92007
Bartholomaus	Derek	Los Angeles	CA	90066
Bauman	Shawn	Krum	TX	76249
Baumann	Shawn	Krum	TX	76249
Bedolla	Felix	Napa	CA	94558
Bell	Norton & Ann	Palo Alto	CA	94301
Bellomo	Adrian	Palo Alto	CA	94301
Bennett	Paul	Lake Forest	CA	92630
Benschoter	John	Oceanside	CA	92057
Bentz	Susan	San Diego	CA	92127
Berger	Mike	Chico	CA	95973
Bergman	Werner	Pleasanton	CA	94588
Bernard	Bruce	San Jose	CA	95123
Binsfeld	Mindy	Maple City	CA	49664
Birkland	Veronica	Santa Barbara	CA	93111

Bishop	Debra	Sacramento	CA	95819
Blackbum	Sandra	La Puente	CA	91744
Bocchetti	Ralph	Santa Ana	CA	92706
Boe	Amanda	Oakland	CA	94610
Bolsky	Debbie	Santa Monica	CA	90403
Bondy	Coleen	Woodland Hills	CA	91367
Boraby	Ali	Toledo	OH	43609
Bortz	Sarah	Irvine	CA	92612
Boysen	Ruth	San Pedro	CA	90731
Brady	Clare	Danbury	CT	06811
Brandon	Victoria	Lower Lake	CA	95457
Brandstetter	Chuck & Diane	Indianapolis	IN	46220
Branscombe	Debira	Cameron Park	CA	95682
Braus	Joseph	Burbank	CA	91505
Brittenbach	Dennis	Vallejo	CA	94591
Brodslley	William	Carmel	CA	93921
Brown	Karminder	Las Vegas	NV	89146
Brown	Myrna	Rosemead	CA	91770
Brown	Steven	Moorpark	CA	93021
Brown	Karminda	Las Vegas	NV	89146
Brunson	Robert	Seaside	CA	93955
Bruskotter	Eric	Santa Monica	CA	90405
Bryan	Melissa	Belmont	CA	94002
Budnick	Brooke	Eureka	CA	95503
Bukovec	Drazen	Zagreb		10000
Burnett	Nona	Robeline	CA	71469
Butler	Darrol	Redding	CA	96003
Bynum	Joshua	Folsom	CA	95630
Calabria	Antonio	San Antonio	TX	78249
Cambron	Vicki	Penn Valley	CA	95946
Campbell	Christopher	Fort Lauderdale	FL	33311
Cannon	Mike	Long Beach	CA	90803
Cape	Christa	Rohnert Park	CA	94928
Carlson	Janice T	Cocoa Beach	FL	32931
Carlson	Ravin	San Clemente	CA	92672
Carpenter	Bryan	San Jose	CA	95119
Carrington	Martha	Oakland	CA	94602
Carson	Chris	Burbank	CA	91501
Carter	Brenda	San Diego	CA	92103
Carter	Marian	West Covina	CA	91791
Cartolano	Lisa	Oakland	CA	94618
Carver	Gwenn	Riverside	CA	92504
Catapano	Lisa	San Francisco	CA	94105
Caton	Roy	Studio City	CA	91604

Caton	Barbara	Studio City	CA	91604
Catone-Huber	Adrienne	Harbor City	CA	90710
Cejnar	Jessica	Arcata	CA	95521
Chadwick	Patricia	New York	NY	10025
Chadwick	Kate	Irvine	CA	92612
Chadwick	Melani	New York	NY	10025
Chapman	LaRita	Las Vegas	NV	89119
Charette	Jane	Issaquah	WA	98027
Charlton	Dawn	Solana Beach	CA	92075
Chase	Everett	Los Angeles	CA	90039
Chazin	Julian	San Diego	CA	92131
Cheng	W.	Manhattan Beach	CA	90266
Chertov	Barry	Sebastopol	CA	95472
Cheshire	Rena	Tampa	FL	33611
Chess	Katie	Ventura	CA	93001
Chittenden	David	Mill Valley	CA	94941
Christy	Michael	Desert Hot Springs	CA	92240
Clark	James	Coarsegold	CA	93614
Cleveland	Paula	San Diego	CA	92103
Clymo	Jerry	Union City	CA	94587
Coe	Michael	Crete	NE	68333
Colburn	Kathleen	Mont Vernon	NH	3057
Cole	Stormbrenjer	Long Beach	CA	90803
Collins	Merl & Judy	Riverside	CA	92503
Collins	Steven	Redwood City	CA	94065
Conlogue	Robert	Dublin	CA	94568
Consbruck	Barbara	Sylmar	CA	91342
Constenbader	Kari	Wilton	CA	95693
Cook	Craig	Santa Rosa	CA	95401
Correnti	Matt	Altadena	CA	91001
Cosetto	Deborah	San Lorenzo	CA	94580
Costa	Leonard	Empire	CA	95319
Coulson-Schlossnagel	Irena	El Cajon	CA	92020
Covalt	Wendell	Redondo Beach	CA	90277
Covington	Teresa M.	Oceanside	CA	92057
Cox	Midi	San Diego	CA	92122
Craig	Wendi	San Luis Obispo	CA	93401
Cromwick	William	Somerville	CA	02144
Crosby	Lorna	Santa Monica	CA	90405
Croskery	JoBee	Los Angeles	CA	90024
Crupl	Kevin	Marquette	MI	49855
Crusha	Connie	El Cajon	CA	92019
Culhane	Lesley	Camarillo	CA	93010
Cunningham	L.K.	Santa Clara	CA	95050

Cunningham	Dan	Pasadena	CA	91103
Currin	Mary	Petaluma	CA	94952
Cutter	Celeste	Santa Cruz	CA	95062
Cutter	Sandra	Martinez	CA	94553
Da Rocha	Camille	San Jose	CA	95127
Dakak	Alan	Yorba Linda	CA	92886
Daniels	Elizabeth	Melbourne	FL	32901
Davenport	Robert L.	Lakewood	CA	90712
David	Rebecca	Astoria	NY	11102
Davies	Merrily	Porterville	CA	93257
De Leon	Pedro Luis	Santa Cruz	CA	95064
DeBin	Joey	Nicholasville	KY	40356
Deeming	Robin	Canyon	CA	94516
Deferrante	Robert	Pasadena	CA	91104
Delair	Linda	San Rafael	CA	94901
Dengel	Patricia	Hummelstown	PA	17036
Denne	Joyce R	Monterey	CA	93940
Denton	John	Springfield	OR	97478
Denzler	Maria	Reno	NV	89521
Derr	Gideon	Dallas	TX	75231
DeWitt	Shana	El Sobrante	CA	94803
Diasio	Donna	Seattle	WA	98105
Dickens	Bart	Santa Barbara	CA	93109
Dollyhigh	Adrienne	Pilot Mountain	NC	27041
Dolney	R Renee	Pittsburgh	PA	15235
Donlin	John	La Canada Flintridge	CA	91012
Dore	Sandra	Kenosha	WI	53144
Dorer	Jeffery	Los Angeles	CA	90034
Dorinson	David	North Fork	CA	93643
Drescher	Linda	Golden	CO	80401
Dubno	Danielle	Rockville Centre	NY	11570
Dusine	Cindy	San Mateo	CA	94403
Dwoskin	Lauren	Fresno	CA	93720
Early	Eric	Cleveland	OH	44134
Eckhouse	Betty	Escondido	CA	92027
Eco	Esmee	Petaluma	CA	94952
Eco	Esmee	Petaluma	CA	94952
Eddy	Dara	Seattle	WA	98107
Eiser	Elyse	Pasadena	CA	91107
Embree	Tina	Mercer Island	WA	98040
Erhardt	Mona	Santa Barbara	CA	93121
Erickson	Karen	San Jose	CA	95125
Errea	Mack	Laguna Niguel	CA	92677
Eshaghpour	David	Pacific Palisades	CA	90272

Estes	Douglas	San Francisco	CA	94118
Esteve	Gregory	Lake Wales	FL	33898
Etta	Moose Mary	San Francisco	CA	94133
Evans	Dan	Los Angeles	CA	90068
Evans	Bethany	Carlock	IL	61725
Evans	Dinda	San Diego	CA	92177
Evans	James	Clearlake Oaks	CA	95423
Evoy	Cherryl	Burlington	NJ	08016
Fairfield	John	San Francisco	CA	94131
Fanos	Nancy	San Jose	CA	95120
Farnham	Elizabeth	Belmont	CA	94002
Filipelli	Deborah	The Sea Ranch	CA	95497
Fischer	Leonard	San Lorenzo	CA	94580
Flanagan	Paula	Bethel Island	CA	94511
Flaum	Elisabeth	Pasadena	CA	91105
Fletcher	Sonia	San Rafael	CA	94901
Fletcher	Richard	San Diego	CA	92131
Flowers	Bobbie Dee	New York	NY	10011
Folnagy	Attila	Harrison	ID	83833
Forcier	Parry	San Francisco	CA	94102
Ford	Richard	Toluca Lake	CA	91602
Ford	Tom	Venice	CA	90291
Fortier	Rollin	Santa Barbara	CA	93103
Franco	Paige	Grand Junction	CO	81503
Frayne	Joseph	Long Beach	CA	90802
Frazer	Mark	Arlington	VA	22207
Frecon	Suzan	New York	NY	10013
Friscia	Anthony	Los Angeles	CA	90024
Fritz	Paul	Sebastopol	CA	95472
Frommer	James	San Diego	CA	92105
Fulton	Phil	Bend	OR	97707
Gaffney	Kathryn	Albany	CA	94706
Gale	Jennifer	Sea Ranch	CA	95445
Galimitakis	Marguerite Joan	Clinton	CT	06413
Gall	Erin	Wilton	CA	95693
Galston	Mamie	Bellingham	WA	98225
Galvin	Paul	Los Angeles	CA	90007
Gambino	Jennifer	Bloomfield	NJ	07003
Garcia	Paula R.	Blythe	CA	92255
Garcia	Michael J.	Huntington Beach	CA	92648
Garcia	Marco	Buena Park	CA	90621
Gardiner	Shayna	Grass Valley	CA	95945
Garman	Jason	Los Angeles	CA	90026
Garner	Scott	Los Angeles	CA	90027

Garrett	Susan	Green Valley	AZ	85622
Gartin	Courtney	San Jose	CA	95138
Gase	Michelle	Fairfield	OH	45014
Geise	Wendy	Fairfield	CA	94534
Geller	Gloria	Los Altos	CA	94022
Gentry	Louis	Mountain View	CA	94040
Gerdes	Heather Lea	Studio City	CA	91604
Gerstein	Michael	San Rafael	CA	94901
Gessay	Glenda	Black Creek	WI	54106
Glardina	Bonny	Los Angeles	CA	90039
Glavina	Sonja	Beachwood	OH	44122
Glavina	Vesna	Beachwood	OH	44122
Gomez	Maria	Des Plaines	IL	60018
Goodrich	Charlie	San Francisco	CA	94107
Goodson	Alan H.	Los Angeles	CA	90026
Goodwin	Diana	Los Angeles	CA	93313
Goolsby	Matt	Placerville	CA	95667
Goraly	Nitzan	Granada Hills	CA	91344
Gray	Jim	Hemet	CA	92544
Griffis	David	Mill Valley	CA	94941
Grindle	Russell	Fairfield	CA	94533
Groff	Robert	Campbell	CA	95008
Groome	Malcolm	Topanga	CA	90290
Grossman	Bonnie	Walnut Creek	CA	94597
Grozaj	Suzana	Zagreb	NO	10000
Gutierrez	Xavienne	Ojai	CA	93023
Haas	Victoria Bacigalupi	Los Angeles	CA	90025
Haines	Lynn	Agoura	CA	91301
Hall	Carol	Boulder	CO	80305
Hall	Linda	Fontana	CA	92335
Hallacy	Lynn	Sacramento	CA	95828
Hammond	Marcella	Spring Valley	CA	91977
Hampson	Doug	San Francisco	CA	94117
Handley	Vance	Los Angeles	CA	90034
Hanna	Mark	Alpine	CA	91901
Hansen	Joanna	Hayward	CA	94542
Hansen	MJ	Los Angeles	CA	90064
Harbeson	Charlotte	Mammoth Lake	CA	93546
Hargleroad	Jewell	Hayward	CA	94542
Harris	Alex	Independence	MO	64055
Harris	Laura	Ontario	CA	91762
Harrison	Diane	Walnut Creek	CA	94596
Harrod	Florence	Encinitas	CA	92024
Hartland	Karen	Burbank	CA	91504

Hawkins	Sharon	Saginaw	TX	76179
Hawkins	Derrell	Washington DC	VA	20032
Hayo	Katie	Paramus	NJ	07652
Hebert	Joan	Menlo Park	CA	94025
Heidemann	Jakki	Fontana	CA	92336
Henriksen	Heather	New York	NY	10014
Henry	Lyle	Los Angeles	CA	90039
Henry	Steve	Santa Monica	CA	90403
Herath-Velby	Gail	Westborough	MA	01581
Herndon	Laura	Burbank	CA	91505
Hessel	Laura	San Diego	CA	92115
Hicks	Aaron	Chandler	AZ	85246
Higgs	John	San Diego	CA	92123
High	Carole	Frostburg	MD	21532
Hill	Rhonda	San Diego	CA	92117
Hill	Barbara	Loyalton	CA	96118
Hiner	Sam & Allegra	Pennngrove	CA	94951
Hoekenga	Christine	Boulder City	NV	89005
Hogerhuis	Kris	Fullerton	CA	92833
Hohlfeld	Eric	Oxford	CT	06478
Holcomb	Susan	Santa Monica	CA	90403
Holley	Nita	Harriman	TN	37748
Holley	William	Redding	CA	96002
Holt	Raissa	North Hills	CA	91343
Holzberg	Steve	Rodeo	CA	94572
Hopkins	Daniel	Covina	CA	91722
Hoppe	Paula	Santa Monica	CA	90403
Horn	Fred	Coronado	CA	92118
Hubbell	Jodi	Truckee	CA	96160
Huff	Chris	Austin	TX	78748
Hughes	Chuck	Mountain View	AR	72560
Hughes	Michael	San Diego	CA	92123
Humphries	Jane	Yucca Valley	CA	92286
Hunter	Keith	Laguna Beach	CA	92651
Hunter	Ruth Anne	Santa Cruz	CA	95062
Hurwitz	Judith	Centerport	NY	11721
Hutchinson	Terrance	California City	CA	93505
Hutchinson	Terrance	California City	CA	93505
Idol	Kim	Reseda	CA	91335
Jackson	Kathleen	Tiburon	CA	94920
Jacquet	Colette	Greenwich	CT	06831
Jacus	Anna	Linden	NJ	07036
Jacus	Anna	Linden	NJ	07036
Jacus	Anna	Linden	NJ	07036

Jarboe	Mike	Reseda	CA	91335
Jasoni	Marilyn	Penngrove	CA	94951
Jensen	Alex	Berkeley	CA	94705
Jensen	Kristen	Scotts Valley	CA	95066
Jessler	Darynne	Valley Village	CA	91607
Johnson	Bill	Tulsa	OK	74107
Johnson	Darrel	Fairfax	CA	94930
Johnson	Douglas	Burbank	CA	91504
Johnson	Laine	Pleasant Hill	CA	94523
Johnson	Gregg	San Jose	CA	95113
Johnston	Timothy	Marina	CA	93933
Jones	Christine	Rosamond	CA	93560
Jones	Michael	San Diego	CA	92117
Jones	Tanya	Costa Mesa	CA	92627
Jones	Laurel	Los Angeles	CA	90025
Kajtaniak	Dave	San Bernardino	CA	92405
Kavanaugh	Michael	San Francisco	CA	94108
Kay	Melanie	Miami	FL	33193
Kaye	Valerie	San Diego	CA	92110
Keating	Joseph	Los Angeles	CA	90016
Keezer	Geoffrey	San Leandro	CA	94578
Kehoe	Kim	Davis	CA	95616
Keller	Arthur	Palo Alto	CA	94303
Kelner	Anna	Pacific Palisades	CA	90272
Kern	Alicia	Rolling Hills Estates	CA	90274
Kerr	Andrew	Long Beach	CA	90807
Kessler	Keith	Kihei, Maui	HI	96753
Kind	Kathryn	Venice	CA	90291
King	Cassie	Jersey City	NJ	07302
King	Kathleen A.	Stone Mountain	GA	30087
Kingsbury	Marcy	San Diego	CA	92115
Kinsey	Graeme	Concord	CA	94521
Kirby	Ruth	Palo Alto	CA	94306
Kirschbaum	Norton & Sarah	Los Angeles	CA	90035
Kirschling	Karen	San Francisco	CA	94117
Kitman	Lorraine	Arroyo Grande	CA	93420
Kittredge	Nancy	Del Mar	CA	92014
Klein	Laura	Berkeley	CA	94703
Klein	William	Walnut Creek	CA	94596
Knapp	Peggy	Escondido	CA	92029
Koenig	Jesse	Palo Alto	CA	94304
Kohler	John	Daly City	CA	94015
Kohlmetz	Phil	Vallejo	CA	94590
Koivisto	Ellen	San Francisco	CA	94122

Kramer	David	Santa Barbara	CA	93105
Krasenics	Kathleen	Marina del Ray	CA	90292
Krausz	Lisa	Tiburon	CA	94920
Krey	Chantal	San Anselmo	CA	94960
Kriss	Nancy	Fremont	CA	94536
Kroehler	Corbett M.	Orlando	FL	32839
Krupnick	Wendy	Santa Rosa	CA	95401
Kupsaw	Wendy	Oakland	CA	94611
Kyle	Luana	Indio	CA	92201
Labadie	Quinn	San Diego	CA	92117
Lamb	Alexandra	Sherman Oaks	CA	91401
Lambert	Bettina	Long Beach	CA	90814
Lambrix	Teresa	San Diego	CA	92103
Landskroner	Ron	Oakland	CA	94611
Lane	Earl	Hannibal	MO	63401
Langlois	Robert J.	Bay Point	CA	94565
Lansdale	Nolan	Hollywood	CA	90028
Larson	Theresa M.	Orinda	CA	94563
Lasahn	Jacqueline	Richmond	CA	94805
Laverne	Tim	Isla Vista	CA	93117
Le Vanda	Stephanie	Los Angeles	CA	90049
Leahy	Martha	Winchester	MA	01890
Lechuga	Erika	Kihei	HI	96753
Lee	Annie	San Francisco	CA	94116
Leeuwen	Natasha Van	Torrance	CA	90503
Lemoin	Lisa	Campbell	CA	95008
Lent	Chad	San Francisco	CA	94115
Lenz	Dawn	Duluth	MN	55805
Lerner	Lora	Santa Cruz	CA	95062
Leshin	Constance	Llano	CA	93544
Levine	Arielle	Berkeley	CA	94703
Levine	Deborah	San Geronimo	CA	94963
Levstik	Patty	Lakewood	OH	44107
Lew	Crystal	San Jose	CA	95124
Lewis	Rebecca	Cleves	OH	45002
Lewis	Nerida	Pasadena	CA	91105
Lewy	Julien	Studio City	CA	91604
Lifson	Robert	Chicago	CA	60640
Lightner	Scott	Beverly Hills	CA	90210
Lila	Trinity	Goleta	CA	93117
Lisle	David	Willits	CA	95490
Livingston	Nicole	Los Angeles	CA	90027
Lloyd	J.D.	Venice	CA	90291
Loeff	Peter	Mountain View	CA	94039

Logan	Ed	Eugene	OR	97404
Loken	Deborah	Rainier	WA	98576
Long	Carol	Santa Cruz	CA	95060
Looby	Judith	North Fork	CA	93643
Lorusso	Nichole	Branchville	NJ	07826
Lotz	Jonathan	Herndon	VA	20170
Loucks	Robert	Corona	CA	92879
Lubinsky	Jennifer	Merrick	NY	11566
Lyerly	Linda	Cardiff	CA	92007
Lynn	David	San Diego	CA	92103
Lyons	Larry & Diane	Burbank	CA	91505
MacArthur	June	Santa Rosa	CA	95401
MacGinitie	Andrew	Roxbury	CT	06783
Mack	Ryan	Ukiah	CA	95482
Macker	Bonnie	North Hollywood	CA	91602
Mackey	Robin	San Francisco	CA	94110
Magoffin	Patricia	La Canada	CA	91011
Malley	Karen	Anaheim	CA	92804
Mallory	Stephen	Carlsbad	CA	92009
Malone	Michael	Calabasas	CA	91302
Mann	Gloria Darlene	San Francisco	CA	94102
Manning-Brown	Helen	Long Beach	CA	90807
Marino	Regina	Hamden	CT	06514
Marks	Patrick	Stockton	CA	95210
Marr	Patrick	Santa Barbara	CA	93101
Marrs	Cynthia	Fall River Mills	CA	96028
Marsh	Nora	Auburn	CA	95603
Marshall	Lisa	Houston	TX	77070
Mathews	Jen	Burbank	CA	91501
Maufer	Thomas	Menlo Park	CA	94025
Maxwell	Adrienne	Los Angeles	CA	90066
Mazor	Raphael	Oakland	CA	94608
Mc Credie	Brian	Thousand Oaks	CA	91360
McBride	Mary	Alpine	CA	91903
McClellan	Linda	Capitola	CA	95010
McCloskey	R	Kelseyville	CA	95451
McCombs	Richard	Northridge	CA	91343
McDonald	Mary Ann	Sacramento	CA	95818
McFarland	Michael	Fresno	CA	93720
McIntyre	J	Laguna Beach	CA	92651
McKnight	Shoshannah	Santa Cruz	CA	95052
McMurdie	Janine	Thousand Oaks	CA	91360
McRight	Blue	Venice	CA	90291
McRoberts	Kevin	Redondo Beach	CA	90278

McVarish	Linda	Laytonville	CA	95454
Meadmore	Stella	Roseville	CA	95661
Meersand	Kenneth	Hermosa Beach	CA	90254
Mein	Joenie	Dallas	TX	75218
Mellander	Mark	Freestone	CA	95472
Meyerhofer	Jill	Oceanside	CA	92054
Mielke	Katja	Hamburg	OH	22297
Mihok	Michael	Bayville	NJ	08721
Miles	Chris	Los Angeles	CA	90041
Miller	Leslie	Northridge	CA	91324
Miller	Dianne	San Diego	CA	92103
Miller	Susan	Graton	CA	95444
Millner	Susan Emge	Cedar Park	TX	78613
Miluck	Alyse	San Francisco	CA	94112
Minnes	Christopher	Los Angeles	CA	90068
Mitchell	Rev Clair E.	Los Angeles	CA	90016
Mitchell	Ina	Woodland Hills	CA	91364
Mitchell	Zephyr	Ben Lomond	CA	95005
Mitchell	Brittney	Fort Collins	CO	80521
Mo	Donna	Los Angeles	CA	90024
Molina	Jessika	Los Angeles	CA	90026
Moneypenny	Mary	Palmdale	CA	93550
Mongan	James	Mount Vernon	NY	10552
Monks	Dennen	San Luis Obispo	CA	93401
Moore	Tina	Grover Beach	CA	93433
Moose	Emory	Mount Pleasant	NC	28124
Mora	John	Richmond	CA	94803
Moreno	RD	Manhattan Beach	CA	90267
Morris	J. Charles	Milligan	FL	32537
Moss	Bryan	Venice	CA	90291
Mott	Marcie	Doraville	GA	30340
Muelken	Walter	Sebastopol	CA	95472
Mulkins	Mary	Los Altos	CA	94022
Mullane	Ananya	Long Beach	CA	90815
Mullane	Sharon	Los Angeles	CA	90066
Murphy	Sherline	Bella Vista	CA	72714
Murray	Noel	Santa Cruz	CA	95065
Mutter	Melissa	Dayton	OH	45420
Myers	Marc	San Diego	CA	92115
Myhre	Jon	Ojai	CA	93023
Nanic	Mladen	Zagreb		
Nazari	Bezhan	Edmond	OK	73034
Nelsen-Maher	Devon	Camrillo	CA	93010
Nelson	Valerie	Arcata	VA	95521

Newman	Jeanne	Gilroy	CA	95020
Newman	Donna	Merced	CA	95348
Nichele	Alexis	Marina Del Rey	CA	90292
Nicholas	Dafydd	Altamonte Springs	FL	32714
Nicholas	Dafydd	Las Vegas	NV	89128
Nichols	Angela	Garland	TX	75044
Nicoll	Susan	Frazier Park	CA	93225
Niswander	Ruth	Davis	CA	95616
Noble	Craig	El Cerrito	CA	94530
Odonnell	Gerard	Los Angeles	CA	90019
O'Hare	Brian	New York	NY	10025
Okamura	Kim	Los Angeles	CA	90066
Orchoiski	Gerald	Pasadena	CA	91104
O'Rear	Reta	Centennial	CO	80122
Orlando	Lillian	Downers Grove	IL	60515
Osborn	Wren	El Cajon	CA	92020
P	M	Greeley	CO	80634
Paddock	Kathryn	Hidden Hills	CA	91302
Page	Linda	Escondido	CA	92027
Pann	Cheri	Venice	CA	90291
Parades	Victoria	Austin	TX	78709
Parker	Vivian	Kelsey	CA	95667
Parker	Eric	El Sobrante	CA	94803
Parrott	Ian	San Francisco	CA	94107
Pasichnyk	Richard	Tempe	AZ	85281
Pasko	Margery A.	Hammond	NY	13646
Patel	Roshan	Macon	GA	31206
Patrick	John	Phillips	WI	54555
Paulie	Carl	Saint Paul	KS	66771
Peasley	C	La Mesa	CA	91941
Perenne	Luise	Fountain Valley	CA	92708
Perkins	Pamela	Los Angeles	CA	90032
Perkins	Randi	Atascadero	CA	93422
Perley	Susan	Santa Fe	NM	87501
Peterson	Sandy	Belton	MO	64012
Peterson	Kimberly	Cloverdale	CA	95425
Pettee	Pam	San Diego	CA	92112
Philips	Mark	Sunnyvale	CA	94087
Pierce	Alison	Burke	VA	22015
Pinkerton	Ann	Oakland	CA	94618
Pino	Dolores	Morton Grove	IL	60053
Placone	Richard	Palo Alto	CA	94306
Plummer	John	Beverly Hills	CA	90212
Pollack	Sharon	San Francisco	CA	94114

Pollock	Jeri	Tujunga	CA	91042
Pomies	Jackie	San Francisco	CA	94122
Ponce	Carlena	Yakima	WA	98902
Porter	Kathleen	Fairfax Station	VA	22039
Potter	Jacquelyn	Lansing	MI	48915
Potter	Cheryl	Santa Cruz	CA	95065
Poverchuck	Susan	Medford	MA	02155
Poxon	Judith	Sacramento	CA	95864
Prado	Janina	San Leandro	CA	94579
Pratt	Debbi	Seattle	WA	98199
Pretzer	C.	Sacramento	CA	95864
Proffitt	Dennis	Ann Arbor	MI	48103
Qayum	Seemin	New York	NY	10012
Rademaker	Ted	Claremont	CA	91711
Rae	M.	Galveston	TX	77550
Rainville	Michelle	Santa Barbara	CA	93101
Ramsey	Jacqueline	Washington	MI	48094
Randall	David	Port Jefferson	NY	11777
Randolph	Bruce R	Key West	FL	33040
Rashan	Yautra	Naperville	IL	60565
Ray	W	Long Beach	CA	90805
Ray	Thomas	Novato	CA	94945
Reback	Mark	Los Angeles	CA	90027
Redmond	Devin	Berkeley	CA	94703
Reed	Timothy	Turlock	CA	95380
Reese	Stephanie	Redlands	CA	92374
Reid	John E.	Mountain City	TN	37683
Reisman	Emil	Dana Point	CA	92629
Renesse	Yolanda de	Los Angeles	CA	90068
Renninger	William	Duke Center	PA	16729
Rice	David	Los Angeles	CA	90069
Rich	Amy	Berkeley	CA	94704
Richards	Vivien	Eureka	CA	95501
Richmond	Lonna	Muir Beach	CA	94965
Rislow	Lillian	Houston	TX	77082
Rivera	Jerri	Alhambra	CA	91801
Robb	Linda	Long Beach	CA	90803
Roberts	Kristin	Berkeley	CA	94705
Robson	Elaine	Topsfield	MA	01983
Roderick	Diane	Agoura	CA	91301
Rodgers	Diana	Santa Monica	CA	90405
Rogers	David	Citrus Heights	CA	95621
Rogers	Elizabeth	Ferndale	CA	95536
Rogers	Lila	Culver City	CA	90232

Roo	Reeta	Sebastopol	CA	95475
Rose	Suzie	San Francisco	CA	94109
Rosenstein	David	Santa Monica	CA	90402
Rubenstein	Leah	Stamford	CT	06903
Rubin	Martin	Los Angeles	CA	90064
Rucker	Judy	Lake Hiawatha	NJ	07034
Rutkowski	Dennis	Garden Grove	CA	92841
Rutkowski	Robert	Topeka	KS	66605
Sabeck	Deanne	Encinitas	CA	92024
Sage	Jean	Weed	CA	96094
Salazar	Joe	Santa Rosa	CA	95407
Salgado	Elizabeth	San Francisco	CA	94110
Saliba	Virginia	Burbank	CA	91506
Sanchez	Meredith	San Jose	CA	95111
Sanders	Richard	Glendora	CA	91740
Santone	Deborah	San Ramon	CA	94583
Sarstedt	Joanna	Los Angeles	CA	90048
Sarver	Valerie	San Francisco	CA	94103
Sawaya	Salim	Arlington	VA	22207
Sayers	Lowell	Austin	TX	78704
Saylor	David	Upland	CA	91786
Scarborough	Alexandra	Culver City	CA	90232
Schaaf	Stephanie	Mountain View	CA	94040
Scheppler	Kacey	Burlingame	CA	94010
Schiffman	Lauren	San Francisco	CA	94141
Schlumpf	Margene	Milton	WA	98354
Scholl	Cathy	Carlsbad	CA	92009
Schorling	Doug	Fresno	CA	93704
Schrader	Kimberly	Grayslake	IL	60030
Schramm	Beatrix	San Diego	CA	92116
Schulenberg	Amy	Los Angeles	CA	90027
Schwendimann	Reverend	Pasadena	CA	91107
Scripps	Theresa	San Francisco	CA	94122
Sealy	Stephen	Rancho Cucamonga	CA	91739
Sealy	Berenice	Rancho Cucamonga	CA	91739
Selle	Jane	Los Angeles	CA	90039
Seltzer	Rob	Beverly Hills	CA	90212
Seraso	Laura	Altadena	CA	91001
Seymour	Paula	Tahoe City	CA	96145
Shahrokhshahi	Rita	Orinda	CA	94563
Shanney	Christina	Santee	CA	92071
Shannon	Steve	Los Angeles	CA	90019
Sharp	Holly	West Hollywood	CA	90069
Shaw	Wendy	Richland	WA	99352

Shawvan	James	San Diego	CA	92104
Sheets	Sarah	Merced	CA	95340
Shell	Karen	La Jolla	CA	92037
Shepp	Jerrell	Los Angeles	CA	90024
Shields	Carol	Los Altos	CA	94024
Shinohara	Joanne	Santa Monica	CA	90404
Shirey	Keith	Altadena	CA	91001
Shook	Matthew	Orange	CA	92869
Shpiller	Natasha	Chicago	IL	60626
Shrode	Jan	Texarkana	TX	75503
Silan	Sheila	Somerset	CA	95684
Silva	Joe	San Diego	CA	92109
Silvers	Robert	San Rafael	CA	94903
Silvestrini	Sasha	Fort Bragg	CA	95437
Simmons	Barre	Springfield	VA	22151
Skrobiza	Kim	Solana Beach	CA	92075
Slaughter	Marianne	Camarillo	CA	93010
Slocum	Jessica	Mount Lebanon	CA	15228
Smith	Ruth	Carmel	CA	93923
Smith	Colin	Berkeley	CA	94708
Smith	Deborah	Oklahoma City	OK	73112
Snider-Gartin	Jennifer	Oxnard	CA	93035
Snyder	Mark	Wynantskill	NY	12198
Sobol	Charlotte	Los Angeles	CA	90028
Sonsteng	Melanie	Rodeo	CA	94572
Sopko Kurrell	Cynthia L.	Auburn	CA	95604
Souder	Margaret	Riverside	CA	92506
Southwick	Justin	Brentwood	TN	37027
Speckart	Carrie	San Rafael	CA	94901
Spinella	Nancy	Rescue	CA	95672
Spotts	Richard	St. George	UT	84770
Spring	Cindy	Oakland	CA	94611
St. Julien	Deborah	San Jose	CA	95136
Stahl	Maria	Montpelier	OH	43543
Stambler	Deborah	Los Angeles	CA	90048
Starke-Livermore	Shanna	Sacramento	CA	95814
Stavis	Alex	New York	NY	10128
Stearns	Elisabeth	Berkeley	CA	94704
Steele	William	Manhattan Beach	CA	90266
Steinman	Jesse	Playa del Rey	CA	90293
Stern	Evelyn	Los Angeles	CA	90049
Sternhagen	Paul	Van Nuys	CA	91406
Stewart	Rosalyn	Berkeley	CA	94703
Stewart	Mary	Greenbank	WA	98253

Stoltenberg	John	Elkhart Lake	WI	53020
Stone	Jessica	San Diego	CA	92128
Storper	Craig	Pacific Palisades	CA	90272
Stouffer	Brenda	Dana Point	CA	92629
Stranger	Peter	Los Angeles	CA	90068
Sullivan	Cynkay Morningson	Santa Rosa	CA	95404
Sullivan	Kelly	Santa Monica	CA	90403
Sumonnath	Sujada	Mojave	CA	93501
Sundberg-Hall	Signe	Downingtown	PA	19335
Suttkus	Jan	Atlanta	GA	30345
Sutton	Rebecca	Berkeley	CA	94708
Suval	Kathleen	Brooksville	ME	04617
Sweel	Greg	Santa Monica	CA	90405
Switzer	Andrew	Alameda	CA	94501
Tache	Bill and Jan	Occidental	CA	95465
Taggart	Carol	Menlo Park	CA	94025
Takagi	Richard	Cypress	CA	90630
Tan	Frances	Lawrence	KS	66047
Tasoff	Jack	San Pedro	CA	90731
Tate	Devon	Nederland	CO	80466
Taylor	Karen	San Diego	CA	92122
Taylor	Amy	San Francisco	CA	94118
Taylor	Robert	Los Angeles	CA	90075
Taylor	Beth	Harrisburg	PA	17101
Thomas	Richard	Richmond Hill	NY	11418
Thomas	Dennis	Pleasant Hill	CA	94523
Thompson	Floyd	Chicago	IL	60657
Thryft	Ann	Boulder Creek	CA	95006
Tillett	Kathryn	Irvine	CA	92620
Trejo	Tonatiuh	Marina	CA	93933
Triplett	Tia	Los Angeles	CA	90066
Troup	Scott	Encinitas	CA	92024
Trout	Sherri	Simi Valley	CA	93063
Trujillo	Deborah	Los Angeles	CA	90066
Turek	Gabriella	Pasadena	CA	91106
Turk	Kendra	Moffett Field	CA	94035
Turner	Leslie	Torrance	CA	90505
Tuttle	Brenda	Woodhaven	MI	48183
Tyler	Janet	Lower Lake	CA	95457
Tynberg	Alexander	San Francisco	CA	94118
Ulman	Barbara	Coarsegold	CA	93614
Underhill	Scott	Temecula	CA	92591
Urgo	John	Claremont	CA	91711
Valenzuela	Andrea	Benicia	CA	94510

Van Noord	Joel	Ann Arbor	MI	48103
Van Voorhis	Russell	Gualala	CA	95445
Vanman	Joyce	San Francisco	CA	94110
Villa	Marco	Corpus Christi	TX	78413
Villavicencio	Alan	Los Angeles	CA	90036
Viney	MaryAnne	Carlsbad	CA	92008
Vinson	John	Shelton	WA	98584
Vitale	Laura	Bellingham	WA	98225
Voet	Jim	Oxford	OH	45056
Vreeken	Margaret	San Rafael	CA	94901
Wald	Johanna	San Francisco	CA	94117
Waldron	Robert	Austin	TX	78745
Wales	Charlotte	Monticello	AR	71655
Wallace	Dawn	Fair Oaks	CA	95628
Watters	Ann	Salem	OR	97301
Waymire	Kristen	Augusta	KS	67010
Wead	Leslie	Durango	CO	81301
Webber	Rita	Canyon Country	CA	91351
Weinstein	James Modiano	Chico	CA	95928
Weintraub	Marisa Nuccio	Santa Monica	CA	90402
Weinzweig	Michael	San Francisco	CA	94110
Weiss	Chris	Long Beach	CA	90803
Wells	Kimball	Rancho Palos Verdes	CA	90275
Westmoreland	Carolyn	Strathmore	CA	93267
Weston	Maria	Long Beach	CA	90807
Wheeler	Breana	San Francisco	CA	94117
Whitaker	Samantha	Los Angeles	CA	90027
White	Ryan	Fullerton	CA	92838
White	Larry	North Highlands	CA	95660
White	Andrea	San Pedro	CA	90731
Whitesell	Kimberly	Herndon	CA	20171
Williams	Dianne	Emerald Isle	NC	28594
Williamson	Mark Jr.	Reno	NV	89503
Williamson	Dan	Pittsburgh	PA	15241
Williamson	Sandra	Fort Collins	CO	80528
Williamson	Peter	Los Altos	CA	94024
Willis	Jennifer	San Francisco	CA	94117
Wilson	Pamela	Oakland	CA	94619
Wilson	Michele	Redondo Beach	CA	90278
Wilson	Patricia and Peter	Santa Rosa	CA	95409
Winter	Michael	Santa Barbara	CA	93111
Wolds	Susana	Boulder	CO	80310
Wolosecki	Jerry Lynne	Sunrise	FL	33345
Wong	Teresa	San Gabriel	CA	91775

Wotherspoon	Robert	Minneapolis	MN	55408
Wright	Clea	Pasadena	CA	91107
Wright	Janet	La Mesa	CA	91942
Wullenwaber	Dana	Redding	CA	96001
Wyberg	Bryan	Coon Rapids	MN	55448
Wyberg	Ken and Sharon	Minneapolis	MN	55419
Yaecker	P	Chagrin Falls	OH	44022
York	Carole	San Jose	CA	95128
Young	Jo Ellen	Culver City	CA	90230
Yukus	Dawn	Stuart	FL	34994
Yule	Alex	Newton	MA	02459
Zaman	Nancy	Lake Isabella	CA	93240
Zoah-Henderson	Zak	Eureka	CA	95501

### Comment Summary

- Recommends the protection of all wildlands that would be designated as the King Range Wilderness under the proposed Northern California Coastal Wild Heritage Wilderness Act.
- Suggest that none of the lands be opened to post-fire logging, road construction, or other human activities that could damage or degrade their wild character, especially for the 30 percent proposed for multiple use.
- Recommends the abandonment of the current RMP and instead requests the management of the entire proposed King Range Wilderness as backcountry.

### Responses

The settlement of *Utah v. Norton Regarding Wilderness Study* clarified that the BLM's authority to expand Wilderness Study Areas or designate additional areas through the RMP process expired in 1993. However, the BLM can make land use allocations through the RMP to manage areas to protect their wilderness characteristics. Within the King Range RMP, the Backcountry Zone represents this allocation. Parcels 1B, 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section (see response 6-1 above), 1HA, and 2B were not included in the Backcountry Zone. These parcels require silvicultural treatments in previously harvested forest stands to improve stand naturalness and reduce fuel loads. These prescriptions would protect the Backcountry Zone from fires originating on private rural subdivisions adjoining the King Range, and protect private lands and structures from fires originating in the KRNCA. Since a primary goal of all silvicultural treatments is to restore previously harvested stands to a late-successional ecological state, the treatments would serve to enhance wilderness characteristics of these lands over the long-term. The Proposed RMP also states that no actions will cause impacts to wilderness characteristics that would affect future consideration for Congressional wilderness designation or BLM management for these characteristics. The BLM is aware of the pending wilderness legislation S-738, "Northern California Coastal Wild Heritage Wilderness Act." Nothing in the Proposed RMP would preclude management of lands proposed in S-738 as wilderness, should this bill be passed into law.

The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees/snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been

altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

Any road re-opening would be temporary in nature and followed by restoration within 12-18 months, and would only occur in limited circumstances where environmental analysis shows direct benefit to improving late-successional forest characteristics and no major watershed impacts; see Section 4.14.5. In some cases these actions may serve the dual purpose of removal and restoration of old logging roads.

The 1970 King Range Act directed the BLM to develop a plan which identifies management of the area for a variety of primary and secondary compatible uses. The proposed zones in this plan reflect a strong emphasis on conservation and restoration of the area's resource values while meeting the intent of the Act (Public Law 91-476). The Proposed RMP does not call for any major new developments, such as permanent roads or facilities (except trails) in the Frontcountry Zone. This zone is not intended to provide only a diminished level of protection; rather, it calls for a more intensively managed restoration effort on those lands impacted by timber harvesting prior to BLM acquisition. The zone also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for "lighter-hand" suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones.

## 6.4 LIST OF PREPARERS

This RMP/EIS has been prepared by an interdisciplinary team of resource specialists from the BLM King Range NCA Office and Arcata Field Office. EDAW, Inc., an environmental consulting firm in San Francisco, California, assisted the BLM in the preparation of these documents and in the planning process. These preparers are listed in Table 6-1.

Table 6-1: List of Preparers

NAME	POSITION	PLANNING ROLE
<b>BLM Staff</b>		
Lynda Roush	Field Manager	Field Manager
Dan Averill	Assistant Field Manager	Assistant Field Manager
Gary Pritchard-Peterson	King Range National Conservation Area Project Manager	King Range Manager, Wild and Scenic Rivers Study Team, Wilderness Study Team
Bob Wick	Planning and Environmental Coordinator	RMP Project Lead, Wild and Scenic Rivers Study Team, Wilderness Study Team, Visual Resources, Transportation

Table 6-1: List of Preparers

NAME	POSITION	PLANNING ROLE
Sky Murphy	Planner	Assistant RMP Project Lead, Wild and Scenic Rivers Study Team
Scott Adams	Outdoor Recreation Planner	Recreation, Wilderness Study Team, Wild and Scenic Rivers Study Team
Carol Sullivan	Interpretive Specialist	Interpretation/Environmental Education
Bruce Cann	Outdoor Recreation Planner	Wild and Scenic Rivers Study Team, Transportation
Paul Fritze	GIS Specialist	Mapping
Dave Fuller	Fisheries Biologist	Fisheries, Riparian/Aquatic Resources, Wild and Scenic Rivers Study Team
Marlene Grangaard	Archaeologist	Cultural Resources, Native American Consultation
Hank Harrison	Forester	Forestry, Special Forest Products
Charlotte Hawks	Realty Specialist	Lands, Rights of Way
Amy Krause	Wildlife Biologist	Wildlife
Brad Job	Engineer	Facilities, Transportation, Air/Water Quality
Sam Morrison	Geologist	Geology, Soils
Tim Jones	Fire Management Officer	Fire/Fuels, Air Quality
Jennifer Wheeler	Botanist	Botany, Range Management, Invasive Weeds
Paul Roush	Wildlife Biologist	Wildlife
Jeff Fontana	Public Affairs Officer	Public Outreach
John Price	Computer Specialist	Website Development
<b>EDAW, Inc. Staff</b>		
David Blau	Principal in Charge	Alternatives Development, QA/QC
Laura A. Watt	Project Manager, Social Scientist	Project Manager, Public Outreach, Alternatives Development, Lands and Realty, Historical and Cultural Analysis
Steve Nachtman	Senior Recreation Planner	Recreation, Special Designations, Alternatives Development, QA/QC
Kevin Butterbaugh	Senior Environmental Planner	QA/QC Document Review
Kimberly Christensen	Public Involvement Program Coordinator	Public Outreach, Alternatives Development, QA/QC
Megan Gosch	GIS Specialist	GIS Mapping
Mark Farman	Senior Resource Planner and Economist	Socioeconomic Analysis
Steve Pavich	Resource Economist	Socioeconomic Analysis
Michael Morelli	Senior Recreation Planner	Recreation
Anne Lienemann	Recreation Planner	Recreation
Brian Ludwig	Senior Archeologist	Cultural Resources
Mike Downs	Senior Social Scientist	Sociocultural Analysis
Jackson Underwood	Archeologist and Ethnographer	Sociocultural Analysis
Richard Nichols	Range Management Specialist	Grazing Resources

Table 6-1: List of Preparers

NAME	POSITION	PLANNING ROLE
Katrina Hardt	Environmental Planner	Transportation and Access
Christine Yang	Graphic Designer	Graphic Design
Nathan Cistone	Word Processor	Word Processing, Formatting
Ron LeValley	Mad River Biologists (subconsultant)	Terrestrial Ecology, Botany and Wildlife Biology, Alternatives Development
Alice Berg	Independent Contractor	Fisheries and Aquatic Biology
Bob Solari	Independent Contractor	Fire Management

## 6.5 ATTACHMENT: COMMENT LETTERS

The letters of comment received from government agencies and various organizations follow; letters of comment from individuals are on file at the BLM's Arcata Field Office.